

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Implementation of the Child Safe Viewing Act;)	MB Docket No. 09-26
Examination of Parental Control Technologies for)	
Video or Audio Programming)	

COMMENTS OF TVGUARDIAN, LLC

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Introduction

What if 70% of the parents in America were tired of the obscene language on TV...

And there was a proven technology that could filter out offensive language, allowing them to enjoy more entertainment...

And that technology was a ready-to-go software solution that could be downloaded into enough cable and satellite boxes to quickly reach up to 90% of the population...

And that technology was offered for free to all the major cable and satellite companies in America...

But they still turned them down—over and over again?

Amazing as it sounds, all this is true and verifiable, as you'll see in these next pages. You'll also see how the digital transition further threatens the availability of this advanced technology for parents, and what the government can do to help.

Executive Summary

Why is Congress asking the FCC to look for newer, more advanced parental controls?

Because what's out there now simply isn't getting the job done. The media industry's biggest efforts toward helping parents began and ended with the V-Chip. Most forms of parental controls we see today are all just variations of the original V-Chip technology that was adopted more than ten years ago. The industry loves to tell us how great the current tools are, but if these tools were really accomplishing their job, Congress would not have passed the Child Safe Viewing Act—it would not have been needed.

What's wrong with the V-Chip? It blocks out entire programs instead of allowing parents to just filter out the objectionable aspects of a program. And the entire ratings system on which that blocking is based upon is notoriously inaccurate—subjective, uneven, built and policed by the very same people producing the programs.

Faced with these challenges, and with parents calling for better controls, how has the industry responded? By providing more education—more education about the same old tools and more education about the specific contents of each TV program. Armed with this information, parents can either choose to not watch certain programs...or use the V-Chip technology to help them not watch those programs. In the end, education is not enough when the end result is still only *watch* or *don't watch*.

Did it ever occur to the media industry that families might want to watch a wide range of programming...without the offensive content? In other words, what about giving families the option to *filter* TV rather than just *blocking* it altogether? Let's look at how that might be applied...

What parent hasn't watched TV with their child and unwittingly shared a rough scene or phrase they hadn't planned on? Wouldn't it be nice to be able to just *skip* that snippet of offensive content automatically? It's a noble goal and a number of companies have tried hard to be of help. But unfortunately the barriers to this becoming a reality are almost insurmountable. Let's look at what would be needed...

First, a universal standard would be required, one that defines all forms of violence, sex, nudity, foul language, drug abuse, cigarette usage, etc. The violence standard alone would have to be able to differentiate between sports violence, cartoon violence, comedy violence, science fiction violence, real life violence and drama violence, to name a few. The sex and nudity standards would have to cover cleavage (no pun intended), the length of a kiss, and so on. After a while, it gets ridiculous. Only foul language presents an easily-definable category. But let's assume that all sex, violence, and everything offensive could be filtered. What then? Those standards would then need to be applied by someone manually screening and tagging *every frame of every scene of every program ever produced or being produced*. If this could be done as quickly as the media industry made closed captioning available on most content, it would take at least 12 years. One can't help but wonder, "Who would pay for all of this?"

And in the end, what would we have? The ability to watch “Terminator” without the violence, or “Sex in the City” without sexual content? When it comes to offensive content, most programs tell you *by their very nature* what you can expect. Choose an action movie and you’re going to find violence; choose a romantic comedy and you’re going to find some degree of sex. There is, however, an exception to that rule about offensive content, and that’s when it comes to foul language. Foul language is an equal opportunity offender—it is found in nearly every form of programming today.

Will you find foul language in an action movie? Of course. In a romantic comedy? For sure. Evening sitcom? Quite frequently! Family programming? You’d be surprised! Animated? “Shrek 2” had 12 instances of potentially objectionable language in it. Is there anywhere you *can* go in TV-land without having to hear foul language? Those places are getting harder and harder to find.

Since foul language is found in nearly every form of TV programming today, it’s not surprising that the vast majority of parents are bothered by it. Time Magazine did a poll and found out more Americans were personally offended by foul language on TV than by sex, nudity, violence or drug abuse. That’s a strong statement, but the percentages back it up: A full 58% of Americans feel there is too much foul language on TV, and that number is as high as 70% when it comes to parents with children at home.

When it comes to TV today, parents need help. And as we saw above, the current tools available to them aren’t sharp enough. They need something better. Realizing that, Congress has asked the FCC to look for “newer, more advanced technologies” for parents. They asked for help in finding tools that could specifically accomplish the following: (1) Work across a wide variety of platforms, (2) work across a wide variety of devices, (3) filter language based upon information in closed captioning, (4) operate independently of the ratings system, and (5) help parents protect their children from indecent or objectionable programming.

There is only one proven technology in the marketplace now that can accomplish all five of these goals, and it is the patented foul Language Filtering Technology offered by TVGuardian.

This technology was invented by a parent in response to a very simple problem. In 1997, Rick Bray had been hearing all the publicity about the V-Chip when he sat down to watch the movie “E.T.” with his children. Together as a family, they heard words like, “shit,” “son-of-a-bitch,” “penis-breath,” and “douche-bag.” Rick wanted to share the timeless classic E.T. with his children; he just didn’t want them exposed to foul language at their young age. He thought, “The V-Chip sure doesn’t solve *these* problems—it just blocks out the whole movie. I can already decide on my own which programs to let my kids see. There’s got to be a better way...”

And, necessity being the mother of invention, he went out and invented a better way: the advanced foul language filtering technology now known as TVGuardian. It allowed parents to turn on the TV, set the level of language to filter out, and watch in peace with their family, knowing they would not be ambushed by curses, obscenities, four-letter words, and all forms of offensive language.

When a family sits down to watch a PG-13 movie with TVGuardian, they have the option of turning the phrase, “Fuck off!” into “Go away!” And families like being able to choose for themselves which of those two phrases they hear. Millions of families have used this technology in their own homes and tens of thousands of them have shared comments like the following:

“Having TVGuardian is arguably the best decision we have made regarding entertainment in our home.” (Freeman, Lilitz, PA).

“If we didn’t have TVGuardian, our viewing would be reduced further by 75%.” (Dale, Portage, WI).

“This is the best product I’ve ever seen. It allows us to watch programs we could not normally watch because of the bad language.” (Elesia Helton, Bremen, GA)

“It’s about the best thing that’s happened in TV viewing in the last 20 years!” (Rob Laskin, Santa Barbara, CA)

Even the FCC website, in response to this Notice of Inquiry, carries over 9,000 comments, the overwhelming majority of which are praising the TVGuardian technology and asking the FCC to help make it available to more families. Here are just a few such comments:

“I won’t have a TV without one!” (James Conner, Brownsboro, TX)

“I cannot watch television without it... It is the single most important piece of equipment in my home.” (Brian Jackson, Doe Run, MO)

*“We **DEPEND** on TVGuardian for our viewing protection.”* (Gary and Jeanne Osborn, Cedar Hill, TX)

*“There are **NOT ENOUGH** products on the market with this wonderful technology.”* (Kiperly Coley, Huntsville, AL)

“I strongly encourage the FCC to adopt laws that would require all or most media devices to have filters installed on them to eliminate abusive language. I would be willing to pay for a filtering system on devices such as DVD players and television or monthly fees via cable/satellite boxes.” (David Nichols, Edgewood, NM)

“I wish the FCC would help more than they do in this area so that the consumer had more options in this area.” (Mark Hendrix, Plymouth, NC)

“It’s an investment into the futures of our children.” (Jack Perry, Conroe, TX)

Will TVGuardian language filtering filter out objectionable scenes? No, as shown above, that’s much more easily said than done. Will it address the number one most objectionable aspect on TV today? Absolutely.

It can be quickly implemented—even downloaded into cable and satellite boxes now in homes within two months, as one satellite executive confirmed. In fact, it’s already been tested in one of the latest satellite HD DVR receivers. It is a ready-to-go software solution that uses existing data already required by law; just drop in the software and it works.

Unlike the V-Chip technology, which responds to offensive content by blocking out whole programs, TVGuardian technology allows viewers to remove *just the objectionable portions* when it comes to language. In other words, it is a *filter* and not a block. Using this proven technology, parents can choose appropriate programs for their children and not have to be ambushed by words like “bastard,” “asshole” and “fuck.” This advanced technology filters automatically, replacing derogatory racial slurs and cursing with non-offensive substitutes. *It also happens to be the only technology that offers equal access for the deaf and hard of hearing by making closed-captions profanity-free, too.* And it can easily be expanded for use with Spanish closed-captions once those are more readily available.

Of course, parents get to choose the filter level they prefer in their own homes. Multiple filter levels are included ranging from very strict to tolerant, and yes, even an Off setting which lets content play unfiltered.

Foul Language Filtering Technology doesn't rest, it is not subjective, it does not make mistakes; it reads the existing closed-captions, looks for specific words and phrases and does its job. It's technology. It's been programmed to perform a task and goes along its merry way doing so—over and over and over again. Parents get to set this technological tool to the filter level of their choice and forget about it. They can watch more entertainment with a new comfort level. They know the Foul Language Filtering Technology will take care of the language, and through this technology, their lives have been changed for the better.

All of the millions of current TVGuardian customers have either purchased this technology as a separate piece of hardware or as a built-in feature within VCR or DVD players. Yet sadly, the majority of Americans still remain unaware that this technology is available to them. And for the most part, they're right. The TVGuardian hardware is no longer being manufactured due to the DTV transition and less and less DVD players are being built with TVGuardian inside. Our company's resources have been focused on bringing TVGuardian to the place where nearly 90% of Americans get their TV: cable and satellite. Our mission from the beginning has been to give *all* Americans the freedom to choose the level of language they hear in their own homes, and cable and satellite represent the best way to do that.

So we took this advanced filtering technology to Comcast, Cox, Time Warner, DirecTV, Dish Network, and their counterparts. We showed these industry leaders testimonials like the ones above and shared proof that the majority of their customers were frustrated by obscene language on TV. But the cable and satellite industry said no to this family technology.

So we went out and built a stronger business case for TVGuardian technology within cable and satellite. Commissioning a survey by one of America's most trusted research companies, we found out that if customers could watch TV without having to hear foul language,

(1) more without pay-TV would subscribe—as many as 38% more; (2) more would subscribe to premium channels—over 50% of those who care about the language; (3) more would purchase pay-per-view programming—40% more; and (4) customers would even *switch providers* to have access to language filtering—again, over 50% of those who care about the language. What does all that boil down to? Potential profits of *tens—if not hundreds—of millions of dollars* from offering foul language filtering technology. Now were these cable and satellite companies ready to offer this? Their answer was still the same: No.

And so TVGuardian asked the customers of these companies to contact them directly if they would like to see advanced foul language filtering made available. We expected hundreds to write, but instead, *tens of thousands* of customers contacted their pay-TV providers directly. Here is just a small sampling of their comments:

“It isn't enough to offer parents channel blocking capabilities. Parents and children alike would appreciate the opportunity to filter inappropriate and completely unnecessary language found in more and more shows and movies.” Matthew Mitchell, Matthews, NC, Dish customer

“Please, please, please give me the freedom to choose what my kids hear.” (Josh Carey, Cox Cable customer)

“I would love to see my PAID program provider offer all programs with the ABILITY to filter the foul language coming into my home.” (Randy, DirecTV customer)

“This one product alone would convince me to stay with you as a customer.” (M. Scott Knuckles, DirecTV customer)

“I would think much more highly of a company that was willing to take at least some responsibility for well being of our country's children. I would also be more likely to recommend that company to others.” (Joyce, DirecTV customer)

“Harsh language is the reason I don't get the premium movie channels.” (David, DirecTV customer)

“I beg of you please to take on the TVGuardian service to keep my business.” (Michael Gardner, Dish customer)

“We should at least have the option. After all, I'm paying for it.” (Steven, Dish customer)

“I would pay extra to have this service. Then maybe I could get something else besides the family package.” (Deborah Kuch, Dish customer)

“I'm seriously considering getting rid of TV altogether, due to the continuing and difficult-to-monitor situation with bad language.” (Tammy, Dish customer)

“My willingness to subscribe to your service would be greatly affected by your willingness to offer this service.” (Eric, Prospective Dish customer)

“WHY, WHY, WHY, WHY, WHY, WHY, WHY are you not doing this already? Kids do not need to be exposed to such bad language.” (Danny Phillips, Time Warner customer)

“If we are willing to pay for a service, why would you NOT be willing to provide it? Please allow us to enjoy what others enjoy without the offense.” (Kevin Robinson, Time Warner customer)

At one point, one of the leading cable companies was receiving over 1,000 requests like this per hour! So how did these companies respond after receiving tens of thousands of requests like the ones above? They still said No.

But we didn't give up. One cable executive called us the most persistent businessmen she had ever met! Maybe that's because we just can't bring ourselves to ignore customers like the ones quoted here.

If customer requests weren't enough, would requests from the pay-TV providers' own retailers and installers do the trick? Realize, the retailers and installers are the ones directly interfacing with customers on a daily basis. Here's what we found out when we surveyed over 600 such retailers and installers: 96% of them wanted TVGuardian technology offered to their customers as a standard feature. 87% said TVGuardian would help them close more sales. 84% said TVGuardian would help them retain existing customers. And 94% said their customers would spend more on premium movie channels and video-on-demand with TVGuardian.

Here are some of the direct quotes from those in the field:

“I hear requests for it all the time. I've got several folks I've called on for years who won't subscribe because of the language.” (A retailer/installer from Tennessee)

“This feature would definitely increase sales.” (A retailer/installer from California)

“It would be a killer application.” (A retailer/installer from Oregon)

“It's in great demand among families, and families are the core of our business.” (A retailer/installer from Montana)

“It would be a good selling tool for families—the current ratings system doesn't work.” (A retailer/installer from North Carolina)

“This would help me close more than a few sales, and probably even go back to the customers I have and get upgrades. I hope they take everybody's comments and really take action on this.” (A retailer/installer from Virginia)

“I personally believe this is a ‘must-have’ for my family or any parent.” (A retailer/installer from Ohio)

“Personally I’ve got five kids, and I’d trade every receiver in the house just to have one with TVGuardian in it.” (A retailer/installer from Texas)

“The ability to keep you children away from bad language is something every provider should offer, not just ours.” (A retailer/installer from Oklahoma)

“There are more people out there who are concerned about the language than they think.” (A retailer/installer from New York)

Again, the evidence TVGuardian gathered seemed incontrovertible. The top executives had told us the ones who knew this business best were the retailers and installers, and over 96% of them came to the same conclusion: Adding this feature would add to their bottom line. Yet the response of the cable and satellite companies? Again, No.

So we made one last attempt: Offering this technology to the cable and satellite industry for *free*. We would give it to them for free and even provide our engineers to help them build it in for free. They could charge their customers a nominal fee for the service and we could split that fee 50/50. And if they didn’t do as well as we believed with this technology? They could keep 100% of the revenues. Surely they could not refuse an offer like this. And yet they did. They said no to an offer that was going to help families, wasn’t going to cost them anything, and was guaranteed to earn them a profit.

Let’s chart the above, shall we?

OUR OFFER TO THE CABLE AND SATELLITE COMPANIES	THEIR RESPONSE
“Help the 70% of parents who are offended by the language on TV.”	“No.”
“Raise revenues by tens of millions of dollars by offering viewers more choices.”	“No.”
“Listen to the requests of tens of thousands of your customers.”	“No.”
“Listen to 96% of your retailers and installers.”	“No.”
“Go ahead and take the technology for free, then.”	“No.”

Are you beginning to see why the government might need to get involved?

Or perhaps we should be more persistent in making our offer known to these companies? We forgot to mention that we have met with more than 100 consumer electronics and cable and satellite companies...in over 75 cities...and over 400 meetings...over a period of twelve years.

In the end, this advanced technology remains largely unavailable, held back from the masses of American families by a handful of powerful media executives. Isn’t the idea of free market that the masses should get to choose, and not a select few who have the power to withhold those options? Even at this very moment, if those companies would step forward, be

proactive, and offer their customers the advanced language technology that has been offered to them, the majority of Americans could be given control over the language that enters their homes and legislation might not be necessary.

In addition to the above, one last barrier exists that is making it even harder to access foul language filtering technology. That barrier is the digital transition. Once this transition is complete, the currently available technology becomes obsolete in most homes. *For foul language filtering technology to work with HD, it must be built into the pay-TV receivers and TVs.*

In a perfect world, those who bring TV to America's parents would also provide them with the newest, most advanced tools for controlling that content and protecting their children.

We clearly do not live in a perfect world.

Time and time again, those with the power to help parents with more advanced tools have chosen instead to act as if nothing better has come along since 1996. More education about old tools is not an advancement. More education about content...while still not offering the latest tools to address that content...falls short of truly helping parents.

It's time for a change.

For more than a decade, we, the makers of the TVGuardian Foul Language Filtering Technology have devoted ourselves to making this tool available to all of America's families. But now we are at an impasse. Those with the power to offer this tool to the majority of America's families have chosen not to do so.

How shall we proceed?

We would love to see the leaders of the cable and satellite industry step forward, along with the consumer electronics industry, offering their full support to bring advanced foul language filtering to parents. Through the methods proposed in these pages, they may do so without ultimate cost. Let us repeat that: They can bring the latest foul language filtering tools to parents and in the long run it won't cost them anything.

We'd hereby like to ask them to do that.

If their answer is "no," then where else can families turn but to the government for help? If industry won't help, only government can assure that parents are provided with the most advanced controls for their children. Here, too, the government can help these families without notable costs. We are simply asking that families be given access to advanced foul language filtering technology, and allowed to pay for it themselves if they want it.

Who will step forward to help parents? If the media industry won't, then we ask that the government help assure that parents are given the very best tools for their children.

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COMMENTS OF TVGUARDIAN, LLC

I. The Currently Available Parental Controls in Place Are Inadequate

Before we begin looking at the parental control tools and ratings currently available to the average American family, let us first recognize that the very fact the debate of appropriate TV for families exists so prominently in America today is because the tools to address this issue are inadequate. Take, for example, car safety. No one would deny this is an important issue, yet it no longer needs to be a hotly debated current topic in America because the proper tools have been provided to address it. In other words, because seatbelts and airbags are now provided, this is no longer a major debate in our society. The tools currently provided to families when it comes to TV, however, are insufficient and outdated, assuring this debate remains. For this very reason, The Child Safe Viewing Act was written to examine advanced technologies “that can improve or enhance the ability of a parent to protect his or her child from any indecent or objectionable video programming.”¹

¹ Child Safe Viewing Act of 2007, December 2, 2008, Section 2(d).

As the FCC Notice of Inquiry explains, “Congress’s intent in adopting the Act was to spur the development of the ‘next generation of parental control technology.’”² It’s worth clarifying, innovative Americans have already developed the next generation of parental control technologies; these technologies just haven’t been easily accessible to families. Before we take a look at what some of that technology looks like, let’s first examine the tools parents have at their disposal now...

A. Lock-and-block Tools Are Imprecise and Often Impractical

The V-Chip has the distinction of having been expensive to license, burdensome to implement, and ultimately ineffective in meeting the needs of most TV viewers today. No wonder other technologies that have tried to follow in their footsteps have had a hard time of it! And as much as major TV providers such as Comcast, Cox, Time Warner, DirecTV and Dish Network like to tout their “advanced parental controls,” all these controls still fall under the same basic category as the V-Chip itself—namely, they “lock-and-block.” You can lock-and-block by ratings or lock-and-block by channel, but either way, it’s still lock-and-block. Don’t want to hear offensive language in a TV program? Turn on this tool and it will block out this program entirely. One must admit that this does indeed prevent objectionable material from reaching the viewers, but it also prevents 100% of the *acceptable* content from reaching the viewers! Whether it goes by the name V-Chip or the misnomer “advanced parental controls,” this form of technology is no more advanced than the Off button already available on all TVs. It is the very bluntness of this tool that intensifies the need for further, more advanced technologies to help parents.

During the original V-Chip debate, television networks feared the V-Chip would block an entire program because of a single profanity. They also feared that they would lose advertising revenue because advertisers would not pay for time slots during programs that might be blocked.³ As James Steyer of Common Sense Media explains, “It’s not in the television industry’s interest to encourage the use of the blocking technology, which would limit the audience and commercial reach of many shows.”⁴ Maybe that is why the National Association of Broadcasters actually recognized the TVGuardian Foul Language Filtering Technology as an effective tool for helping parents control the television programs their children watch.⁵

The lock-and-block technology also has the misfortune of being tied to the notoriously inaccurate and unstable ratings system.⁶ It’s a case of wolves tending the sheep. Those that benefit financially—the broadcasters, cable television networks and producers—are also the ones rating the content.⁷ Katherine Kuhn, author of “The Ratings Sham II” for the Parents Television Council, explains, “What most people don’t realize is that there is no independent body

² Notice of Inquiry in MB Docket No. 09-26, FCC 09-14, March 2, 2009, Introduction

³ Price, M. E. (1998). “The V-Chip Debate Content Filtering From TV to the Internet”. Mahwah, NJ

⁴ James Steyer, “The Other Parent,” p. 63.

⁵ October 15, 2004 Comments filed in the Matter of Violent Television Programming and Its Impact on Children, See http://fjallfoss.fcc.gov/prod/ecfs/retrieve.cgi?native_or_pdf=pdf&id_document=6516730486 in section III.

⁶ Diane Hollenbeck, “What Happens When TV Ratings Are Wrong?” See.

http://www.focusonthefamily.com/entertainment/mediawise/tv_and_todays_family/what_happens_when_tv_ratings_are_wrong.aspx

⁷ See. <http://www.tvguidelines.org/faqs.htm>

administering the ratings, monitoring their use, or ensuring accuracy and consistency in their application; there are no rules governing the ratings' use; they are not subject to any kind of testing to ensure their accuracy; and the networks are not penalized for failing to use them properly." Ms. Kuhn continues by pointing out, "There is also an element of self-interest at play in allowing the networks to rate their own programs. Networks are financially motivated to under-rate their programs because a more restrictive rating could scare off advertisers."⁸

Kuhn's study showed two-thirds (67 percent) of the shows reviewed lacked one or more of the appropriate content descriptors:

- 54 percent of shows containing suggestive dialogue lacked the "D" descriptor
- 63 percent of shows containing sexual content lacked the "S" descriptor
- 42 percent of shows containing violence lacked the "V" descriptor
- 44 percent of shows containing foul language lacked the "L" descriptor⁹

So where does that leave the parent? Let's assume you're fine with blocking a program entirely if it has objectionable content such as offensive language. You may set lock-and-block technology to filter any program that warns you of "L" for "Language." Will your remaining viewing choices be profanity-free? Not by a long shot.

Take, for example, the movie "Independence Day." A detailed review of it shows no less than *61 usages* of crude, obscene or profane language within this movie.¹⁰ Yet in most cases when this movie is broadcast, the "L" is not even listed in its ratings! That means that even though you may have set your lock-and-block technology to skip objectionable language, in the case of "Independence Day," you will still end up hearing "shit" three times, "son of a bitch" three times, "Jesus!" as an exclamation three times, "damn" five times, "God damn," and "hell" seventeen times, just to name a few.

In other PG-13 movies, viewers often assume that the word "fuck" won't be heard too often, but this is not the case. Two recent movies pG-13, "The Hip Hop Project" and "Gunner Palace" carry a reported 17 and 42 uses of the word "fuck," respectively.¹¹

So the shortcomings of the "advanced parental controls" available to parents today through pay-TV providers are plain to see for even the most casual observer: (1) Lock-and-block technology blocks *all* the content of a program, not just the objectionable portions, and (2) lock-and-block technology is built on an unstable foundation of varying and subjective ratings, meaning you are never quite sure whether you're going to be able to avoid the objectionable content you've programmed it to avoid. Remember those facts the next time you hear the media touting the "advanced parental controls" they've made available to parents. Maybe that's why Congress, in the Child Safe Viewing Act, specifically asked for technology that can "operate independently of ratings pre-assigned by the creator of such video or audio programming."¹²

⁸ See. <http://www.parentstv.org/PTC/publications/reports/ratingsstudy/RatingsShamII.pdf>

⁹ Ibid.

¹⁰ See http://www.screenit.com/subscribers/movies/1996/independence_day.asp#p

¹¹ "The Hip Hop Project Rated PG-13, Despite 17 F-Words," <http://www.cinematical.com/2007/04/27/the-hip-hop-project-rated-pg-13-despite-17-f-words/>

¹² S602 The Child Safe Viewing Act, Section 2(b)

A. Education Alone Isn't Enough

Question a media executive about the content on TV today and they'll immediately show you how many resources they've devoted to telling parents about the existing lock-and-block technology. By educating viewers about content and offering a way to block out that content entirely, they imply the job is done.

In 2006, the Consumer Electronics Association, National Cable and Telecommunications Association, National Association of Broadcasters and the Motion Picture Association of America wrote to Congress saying their groups had unified to form a nationwide campaign to the tune of \$300 million with one specific purpose: "To inform and explain to American parents they have total power—right now—to control all TV programs in their home."¹³

Unfortunately, the "total power" referred to here is the same lock-and-block form of technology they had been forced to adopt ten years earlier and had barely been improved on since. In their own words: "This means that over and over again parents will be visited by simple, easy-to-grasp instructions for use of the V-Chip as well as cable blocking mechanisms."¹⁴

The other type of education the media industry likes to undertake is that of informing viewers about content. The idea here is to tell parents about the content of a program, in theory giving them the chance to avoid it. But the challenge here is that, first, the information provided is based on the proven-to-be inaccurate ratings system, and, second, even if the objectionable material is highlighted, the proper tools to address it still aren't available. Let us give some examples...

Everybody considers "E.T." to be a kid's movie, right? Even the ratings provided by Common Sense Media rate it as acceptable for kids as young as seven years old. But watch that movie tonight with your kids and here's a sampling of what you'll hear: "shit... shit... damn... damn... son of a bitch... penis-breath... douche bag."

One can only wonder: Would those words be acceptable in a speech given to first graders?

Now that you know "E.T." has a degree of objectionable content, it's time to deploy the "advanced parental controls" offered to you by your cable or satellite provider. The result? *You don't get to see "E.T."* Once again, your only options using the current tools are analogous to the Off button on your TV—they tell you, in effect, "Just don't watch it at all, then."

What about a movie like "King Kong" (2005) rated PG-13? Common Sense Media rates it as being appropriate for children age 13 and above, and says it has "mild language". Yet, ScreenIt.com rates it as having "moderate language," with five uses of God damn, four of Christ

¹³ Letter to the Honorable Robert Aderholt, February 16, 2006

¹⁴ Testimony to the Senate Commerce Committee, January 19, 2006

used as a cuss word, plus Holy Christ, Jesus, Jesus Christ, and some hells, and craps thrown in for good measure. To some viewers, and to Common Sense Media, those words used as profanities are not offensive, but to others, using them that way is more offensive than had they said “Fuck.” Many would disagree. Many would agree. That’s the point. *This is about personal choice.* It’s a personal preference that only a parent can decide for their children, and one only controllable through technology—specifically, Foul Language Filtering Technology. Through technology, parents can specifically choose whether these words are filtered, or not.

As for TV shows, the information is much more sketchy. Common Sense Media does not rate individual episodes of a series, it only rates the series. You might get information from the site, for instance: “some slang such as description of breasts as ‘shakers,’” as it says about the TV series, “According to Jim.” However, some specific episodes actually contain, “damn it, crap, hell, ass, son-of-a-bitch,” and “bastard.”

So the problem with relying upon the education option when it comes to parental controls is that the accuracy of the information is spotty and the remedy is almost non-existent. As Acting Chairman Michael J. Copps of the FCC wrote, “Parents must be armed with information about programming content *and the tools to prevent their children’s exposure to content the parents find objectionable.*”¹⁵ (emphasis added). Education is an honorable start, but it is only helpful to the degree that the proper tools exist alongside it...

As an example, imagine warning only certain residents of a major city that traces of mercury have been found in their water supply. Then when those residents call for help, they are told: “We’ve done our part—we’ve educated you. Now if you don’t want the mercury, just don’t drink the water!” With only those limited options at hand, spending any amount on further education—even \$300 million—won’t ultimately solve the problem. Perhaps for this very reason, *the Child Safe Viewing Act doesn’t call for more education; it calls for new technology.*

C. Even Family Programming and the Family Hour Fall Short

“If the content offends you, then stick to family programming.” That’s a logical response. But can it always be applied? Let’s look at just one example of family programming to find out whether they provide a reliable source of objectionable-free material...

How about the movie “Miss Congeniality”? It can be seen on HBO Family. Upon reviewing the information on Cox Cable’s program guide you’ll see that it is rated PG-13 (V, D) and it is about a clumsy FBI agent going undercover at a beauty pageant.¹⁶ Okay, so it is on HBO Family and we know from the information that it doesn’t have foul language, only a little violence and dialog appropriate for a 13-year old. What young girl wouldn’t want to watch it? Yet, here’s what you’ll hear in this movie if you sit down to watch it with your family: “Shit... shit... ass... ass... ass... ass... ass... ass... asshole... asshole... damn... damn... damn... damn... damn... damn... hell... hell... hell... hell... hell... hell... crap... God damn... God damn... God damn... Jesus... Jesus... Jesus... oh my God... oh my God... oh my God... oh my God... oh

¹⁵ Statement of Acting Chairman Michael J. Copps regarding the Child Safe viewing Act, March 2, 2009

¹⁶ Cox Cable electronic program guide viewed April 12, 2009.

my God... oh my God... oh my God... my God... my God... God... God... for God's sake, Jesus Christ, oh Jesus, and oh Lord."

How about TV shows? Quickly, think of three shows currently shown on NBC, CBS, ABC, CW or FOX during primetime that are good for the entire family. Could you do it? The Parents Television Council uses a stop light approach to rate primetime TV shows – Red means the Show may include gratuitous sex, explicit dialogue, violent content, or obscene language, and is unsuitable for children; Yellow means the show contains adult-oriented themes and dialogue that may be inappropriate for youngsters; and Green means it is a family-friendly show promoting responsible themes and traditional values. During the seven day period from Friday, April 10 to Thursday, April 16, the PTC only gives one show a Green Light the entire week – Extreme Makeover: Home Edition.¹⁷ There were twenty-four with a Yellow Light. These programs are okay for the entire family sometimes, but not all the time... depends on the episode. These are the programs in which technology is needed.

Is refuge to be found in the Family Hour, then? Not according to research by the Parents Television Council, which found that foul language during the Family Hour increased by 94.8% between 1998 and 2002 and by more than 109% during the 9:00 p.m. ET/PT time slot.¹⁸ Words cited by the PTC that were found during the Family Hour include "ass, screwing, bastard, bitch," and "son of a bitch." A more recent review by Family First found the following words on four free-to-air channels between 6pm and 8:30 pm:¹⁹ "bitch, fuck, ass, piss, bastard," and "holy fuck."

I'm sorry to have to use such language in compiling this report, but this is what's on TV today.

II. Other Proposed Technologies May be Premature And Costly To Implement

In this section you'll learn that other parental control technologies can't use the existing closed-captions. Each one would require the development of a whole new data infrastructure that would take the industry at least 12-years to get ready...

Wouldn't it be nice if we could watch the TV shows and movies we wanted and just *filter out* the sex and violent parts we *don't* want? Technologies such as ClearPlay, CustomPlay and CC+ have tried to do just that. Don't want to see nudity on your TV? These technologies can block out those bare breasts... in theory. We sincerely wish these types of technologies the best of luck, but none of them are ready-to-go for real-time television, or will be anytime soon. We must also address the inherent challenges for them to accomplish these goals—namely, (1) any objectionable content aside from foul language can only be filtered based on subjective judgment calls, and (2) the implementation of such technologies into the wide range of devices and platforms mentioned in the Child Safe Viewing Action would represent an overwhelming burden for the media industry to deploy.

¹⁷ See <http://www.parentstv.org/ptc/familyguide/weekly.asp> (last visited April 12, 2009)

¹⁸ Parents Television Council, "The Blue Tube: Foul Language on Prime Time Network TV."

¹⁹ Family First, "Family TV Viewing Saturated with Foul Language," December 8, 2008

Let us explain...

First, the subjectivity issue. Let's start with nudity. Say you want it filtered out. Fine. But what about cleavage—are you okay with that? How *much* cleavage, then? Shall we measure in order to apply the standards? What about a wet t-shirt? Let's move on. Sexual content. We have a pretty general idea of what we don't want to see here. But what about a couple in bed—as long as they're not *doing* anything, would that be permissible? How much “activity” would be allowed, then? What about a kiss? A three second kiss? A ten second kiss? Somebody's going to have to be pretty subjective here when it comes to judging this material. Unfortunately, one person's definition of permissible rarely matches that of another person.

What about violence? Turns out it's even more difficult to accurately define than nudity and sex. In the FCC's report on violence, reference is made to cartoon violence, sport violence, drama violence, comedy violence and science fiction violence before Commissioner Jonathan Adelstein finally writes, “Given that we are not able to offer a definition ourselves, it does not appear to be as easy to define as some suggest.”²⁰

When it comes to objectionable content, the only category that appears relatively easy to define is that of foul language. Generally in our society, it is understood that crude language includes words like “crap” and “ass;” mild language includes words like “damn” and “hell;” and strong language refers to words like “asshole” and “fuck.” There are further sub-categories that can also be defined, such as language which is disparaging of a person's race, religion or sexual orientation. So not only is the category of foul language definable, but even different levels *within* that category are generally definable. Unlike nudity, sexual content and violence, the vast majority of all foul language can be compiled onto a single written list. You or I might quibble over the categorization of a few of those words, but for the most part, speakers of English know a foul word when they hear one.

Now, even though we've just seen that only one out of the four major categories of objectionable content can be accurately defined, let's look past that and assume we nonetheless want to bring specific, sex and violence content filtering technology to the masses of Americans. What would that entail? *Every single frame...of every single scene...of every single television program would have to be manually screened and tagged in advance.* That's a daunting task. To what can we compare it to? How about the process by which closed captioning was added to the majority of TV programming? *This was a 12-year process.*²¹ If scene-tagging could be accomplished in just as quick a time, it would still take so long to implement that only those children who are currently under five years of age would be able to see it before their childhoods are over—at age 17. Parents want a solution now—while their kids are still actually kids.

²⁰ Statement of Jonathan S. Adelstein in “Violent Television Programming and Its Impact on Children,” Report, MB Docket No. 04-261

²¹ Closed-Captions requirement passed in Telecommunications Act of 1996. As of January 1, 2006, all “new” English language programming, defined as analog programming first published or exhibited on or after January 1, 1998, and digital programming first aired on or after July 1, 2002, must be captioned, with some exceptions. For pre-rule programming: 75 percent of programming per channel per quarter by January 1, 2008, and thereafter.

Getting any of these other technologies ready for the majority of content would likely take even longer than 12-years, the closed-captioning implementation was a good measure of the effort involved, and no one had to manually view each frame and make a judgment call.

Here are two separate illustrations of just how big this task would be:

- 1) Consumers can get more than 280 channels today. That's more than 6,720 hours of programming available each and every day – not all apply, such as news and sporting events, but you get the idea; and
- 2) The Internet Movie Database statistics show 1,406,512 content titles, including theatrical releases, TV series episodes, made for TV movies, direct to video movies, and video games; and this number is rising every day.²²

It goes without saying, the size of the task and the associated cost to manually review and tag it all for potentially offensive content is daunting to say the least.

I wish all of this weren't true. It would be nice to turn on TV, set the filters to take care of *all* objectionable content, and sit back and watch in peace with one's family. But that can only become a reality if universal standards for every form of objectionable content can be established and then applied to every single frame of every single scene ever produced or being produced. And then, oh yes, somebody needs to foot the bill for this huge 12-plus year project. Any volunteers?

One final note on other technologies: Before it was legislated, the V-Chip was largely untried in the marketplace. In the same way, the scene-filtering technologies mentioned above are largely unproven in the marketplace for use with television. The TVGuardian Foul Language Filtering, on the other hand, is a proven technology for television.

In the following sections we will look at the one category of objectionable content that *can* be reasonably defined: foul language. We'll discover that this happens to be the category that bothers Americans the most, that advanced technology already exists to solve that problem completely, and that this solution can be implemented quickly and without ultimate cost to government or the media industry.

III. Foul Language is the Number One Most Offensive Aspect on TV Today

A lot of people might have trouble with the title of this section, because it just seems so hard to believe. Many of us would have guessed sex or violence. But let's look at where this claim comes from...

Time Magazine took a poll asking, "Is there too much cursing and sexual language on television?"²³ 58% of respondents said yes, compared to 66% who said there was too much

²² See http://www.imdb.com/database_statistics

²³ Time Magazine, March 28, 2005, "Has TV Gone Too Far?"

violence on television. But when the next question asked, “Are you personally offended by it?,” offensive language beat out every other category. 42% said they were *personally offended* by the language on TV. This was a higher percent than for violence, explicit sexual content such as nudity, and depictions of drug and alcohol abuse.

Why is that so? One could conjecture that while violence and sex are generally limited to an expected range of programs, foul language is an equal opportunity offender, popping up unexpectedly in an astonishingly wide range of programs. For example, you know you won’t see bare breasts or blood and gore in the average sitcom, but can you say the same for offensive language? As we saw in Section C above, neither the nature of a program or the time in which it is broadcast are safe indications that foul language is not present. In other words, of all categories of objectionable content, foul language is the one that is most widely prevalent across the entire gamut of programming.

The co-founder of the Civility Project at Johns Hopkins University says that cursing is “Still the language of aggression... the precursor to violence.” He notes, “Very often, rudeness and cursing are the beginning of an escalation toward violence. Words, our words, are like our hands. They can soothe and heal, but they can also strike, which means they can hurt.”²⁴

Fortunately, this number one most offensive aspect on TV today—foul language—is completely addressable and solvable.

IV. Advanced Foul Language Filtering Technology Effectively Addresses the Number One Most Offensive Aspect of TV

“TVGuardian technology actually detects and filters profanity and other offensive phrases chosen by the parent—including ‘hate words’ and racial slurs—while you watch movies or television shows.”

—Former FCC Commissioner Deborah Tate²⁵

So far we’ve seen that the currently available parental controls are imprecise and inaccurate—imprecise because they block rather than filter, and inaccurate because they are based on an unstable ratings system. As such, telling more people about those tools doesn’t accomplish much. Neither the Family Hour nor even family programming solve the problem, either. And while we may long for the day when technology can filter every objectionable aspect of every scene on TV, we have to be honest in acknowledging that such a day isn’t here yet. There is, however, something we can do to address the number one most offensive aspect of TV today. That aspect is foul language and the tool that’s available now is the TVGuardian Foul Language Filtering Technology. Even a quick glance at the Child Safe Viewing Act reveals just how appropriate of a response this technology is:

Section 2(b) of the Act asks the FCC to consider advanced blocking technologies that:

²⁴ P.M. Forni, quoted by Lini Kadaba, “Some Cry Foul, Others ‘Bleep On.’” Orlando Sentinel. 31 May, 2000, Pg. E1.

²⁵ FCC Violence Report

- 1) **may be appropriate across a wide variety of distribution platforms, including wired, wireless, and Internet platforms;** (The TVGuardian foul language filtering technology works across a wide variety of distribution platforms, including wired, wireless and Internet platforms).
- 2) **may be appropriate across a wide variety of devices capable of transmitting or receiving video or audio programming, including television sets, DVD players, VCRs, cable set top boxes, satellite receivers, and wireless devices;** (The TVGuardian foul language filtering technology works across a wide variety of devices, and has already been implemented into over 12 million DVD players, VCRs and Combos. It has also been successfully test implemented into an HD DVR satellite receiver from a major pay-TV provider).
- 3) **can filter language based upon information in closed captioning;** (That's exactly what this technology does—filter language based upon information in *existing* closed captioning).
- 4) **operate independently of ratings pre-assigned by the creator of such video or audio programming; and...** (And thank God it does that! The TVGuardian technology operates completely independently from the inaccurate ratings system).
- 5) **may be effective in enhancing the ability of a parent to protect his or her child from indecent or objectionable programming, as determined by such parent.** (For this very reason, TVGuardian was invented...and deployed into the marketplace...and proven successful...and has already helped millions of families).

The FCC Notice of Inquiry specifically requests advanced blocking technology that also works across the following variety of devices and platforms:

Television. “Apart from the V-chip, we invite comment on any other advanced blocking technologies for television either currently in existence or under development.”²⁶

Cable and Satellite. “In addition to technology currently available, are there any new technologies under development or on the horizon for satellite or cable? We also invite comment on how we could encourage the development of new technologies for these services, as well as their use by parents.”²⁷

Wireless Devices. “In addition to the blocking technologies discussed above, we also seek information on any other types of blocking or filtering technologies currently available to consumers or other technologies currently in development for use on wireless devices.”²⁸

²⁶ NOI Docket 09-26, page 10, paragraph 23.

²⁷ NOI Docket 09-26, page 12, paragraph 26.

²⁸ NOI Docket 09-26, page 13, paragraph 32.

Non-networked Devices. “We invite comment on whether blocking technologies exist or are under development for DVD players and VCRs and, if so, how these technologies compare to blocking technologies available for other distribution platforms and networked devices.”²⁹

Content Available Over the Internet. “We also invite comment on how we can encourage the development and use of advanced blocking technologies and other parental control solutions for video and audio programming available over the Internet.”³⁰

Blocking Technologies Compatible with Multiple Platforms. “Finally, we seek general comment on whether there are blocking technologies currently available or in development that are capable of operating across multiple platforms.”³¹

The answer to all the above categories: *The TVGuardian technology is applicable in every category.*

For specific details, please see Appendix C: How the TVGuardian Technology Works Across a Variety of Devices and Platforms.

TVGuardian advanced foul language filtering technology is a ready-to-go, software solution that works with all the devices and platforms mentioned above. It has a very small footprint of around 5-10k in size, meaning it takes very little memory space and will fit into existing chipsets without adding any hardware costs. DVD player manufacturers have in the past successfully implemented this technology from start to finish in usually just a few days, and sometimes just a few hours. Furthermore, since this technology works by reading the existing closed-captions already required under the Americans with Disabilities Act and Telecommunications Act of 1996, and *it has the added benefit of filtering offensive language within the closed-captions for the deaf and hard-of-hearing.*

To summarize the above, TVGuardian advanced foul language filtering technology:

Works across a wide variety of platforms	YES
Works across a wide variety of devices	YES
Filters language based upon closed captioning	YES
Operates independently of the ratings system	YES
Helps parents protect their children from indecent or objectionable programming	YES
Works on television	YES
Works on cable and satellite	YES
Works on wireless devices	YES
Works on non-networked devices	YES
Works on content available over the Internet	YES
Works across multiple platforms	YES
Benefits the deaf and hard of hearing	YES

²⁹ NOI Docket 09-26, page 15, paragraph 36.

³⁰ NOI Docket 09-26, page 19, paragraph 42.

³¹ NOI Docket 09-26, page 20, paragraph 44.

Before proceeding further, allow us to briefly address a few objections that might be forming in your mind...

“But we already have the V-Chip!”

Yes, but as we saw above, it’s not enough. Instead of locking or blocking an entire show, this technology allows families to watch the programming they want to watch, without the objectionable language they’d rather not hear. In other words, it *filters* instead of *blocks*. What are the implications of that? First of all, instead of *less* programming to watch—the obvious result of lock-and-block technologies—viewers are now given *more* programming to watch. Families can now select movies without graphic violence and sexual content, and enjoy the entertainment without the fear of being offended by the language. This opens up a whole new range of programs that families can now watch together.

“TVGuardian doesn’t block out sex and violence.”

That’s correct. As explained above, we don’t believe the technology nor infrastructure currently exist that would effectively solve those problems completely on TV in the near future.

Let’s be honest, most programs that have sexual or violent content have a theme that’s not intended for children anyway. Blocking out the sexual innuendo contained in a show like “Two and a Half Men” or “How I met Your Mother” would *not* make those shows suitable for children, nor would blocking out a few snippets of violence from a show that’s inherently violent like “CSI: Crime Scene Investigation” or “24”. These programs were not intended for children in the first place. Although, that doesn’t mean parents couldn’t use more help. With better information, better ratings from an *independent* monitoring Board and proper use of the V-Chip, parents could effectively protect their children from these types of shows.

Foul language, on the other hand, is an equal opportunity offender. It’s in practically all movies and far too many TV shows – even those targeted to children. Filtering the bad language out of a program that does not contain graphic violence and sexual content can turn it into a show that’s acceptable entertainment for the whole family to enjoy.

“Closed-captions aren’t accurate. Doesn’t that mean TVGuardian isn’t accurate?”

Well, first of all, that’s an interesting concern from defenders of a ratings system that sometimes forgets to put an “L” warning on a movie containing over 50 offensive words! The TVGuardian foul language filtering technology is actually 100% accurate. However, sometimes errors within the closed captioning will bring that accuracy level down to 96% or 98%. What does that mean? One could watch TV for an entire week and the technology would likely catch 100% of the foul language. Then, on a particular movie, it may filter 45 words and miss two. However, if closed captioning standards are raised, as is currently being considered by the FCC³², this technology can easily be raised to 100% effectiveness. In the meantime, saying

³² Notice of Proposed Rule Making, Closed-Captioning of Video Programming, GC Docket No. 05-231

TVGuardian technology is inaccurate is like saying a Lexus doesn't offer a smooth ride because it occasionally hits bumps in the road.

“What about free speech?”

We applaud it! We also believe in the freedom for Americans to *not* have to be subjected to racial slurs, hate language, language offensive to those with strong religious beliefs, cursing and obscenity...within the privacy of one's own home...every time one turns on the TV. Please note that the factory pre-set setting for this technology is *Off*. In other words, it's only applied when a family chooses to set it up and use it, and those families can also decide for themselves just what level of words they want filtered. As for the legality of this technology, the Family Movie Act of 2004 clearly allows for “the making of limited portions of audio or video content of a motion picture imperceptible”³³ in the privacy of one's own home. Even without the Family Movie Act, the Foul Language Filtering Technology does not alter the original or copy any part of it. It merely reads the closed-captions, triggers a mute when offensive content is detected, and displays text on the TV screen during the mute; thus helping the viewer follow the story.

“You guys are a private company, and no single company should profit from this.”

We are indeed a private company but we are also men on a mission—fathers who invented this technology and have spent more than a decade promoting it in the face of incredibly daunting odds. We have traveled to five foreign countries and more than seventy-five cities multiple times, paying our own way, with numerous meetings at most companies over the space of a decade. As you'll see in upcoming sections of this report, we have offered this technology to the pay-TV industry for pennies *or even for free*, just to bring it to more families that want access to it. Under our business model, we won't profit from a government mandate; we will only profit when people actually start using and paying for this advanced technology themselves.

“Why should the government get involved if it's already available?”

Good question! And the answer is this: Because the digital transition will render this technology largely obsolete unless it is built in to existing technologies such as TVs, cable or satellite boxes. Furthermore, to truly make advanced language filtering technology available to all American families—across all the platforms and devices mentioned in the Child Safe Viewing Act—will require a degree of cooperation that the makers and gatekeepers of these technologies have so far not demonstrated.

Now that we've addressed some potential concerns, let's take a closer look at advanced profanity filtering technology, starting with:

³³ Family Movie Act of 2004, H.R. 4586

“How does it work?”

It works, quite simply, by reading the closed captioning already embedded and required in most forms of television video content. As it reads the hidden closed captioning in the background and encounters words deemed offensive by the viewers who are using the technology, it mutes those words or phrases and replaces them with less offensive substitutes in the captions. A more in-depth description is outlined in Appendix B.

“What does it look like?”

Here are some examples of what advanced profanity filtering technology looks like when deployed:

- If a character shouts out, **“Shit!”**, that word is simply **muted**.
- In the case of, **“Get the fuck out of here!”**, that phrase is muted and closed captioning pops up for duration of the phrase with the words, **“Get out of here!”**
- **“You’re an asshole!”** becomes **“You’re a jerk!”**
- **“She’s a bitch”** becomes **“She’s a nag.”**
- **“Hey, Nigger!”** becomes **“Hey...!”**

And so on. The TVGuardian foul language filtering technology actually filters over 450 offensive words and phrases. It actually looks for the root words. This enables it to catch the creative uses of the four-letter words, too.

We’ve tried to strike a balance between ease of use and flexibility. Listing all the words would scare people and become overwhelming. So users select one of four primary filter levels from *Strict* to *Tolerant*, or, of course, *Off*. By way of example, *Strict* captures all offensive words, while *Tolerant* captures only the strongest levels of obscene language and allows words like “hell, damn, ass” and “shit.” So the technology may be set to mirror the *internal* settings each person has that dictates which words they are comfortable with or offended by.

The technology also gives parents sub-categories to select—those words that really don’t fall into the primary categories. This gives parents the ability to fine tune the filtering. There are separate ON/OFF switches parents set, if they wish, for: Hell/Damn, offensive Religious References, Sexual References, and Racial Slurs. Additional sub-category ON/OFF switches are also available. In addition, the substitute words can be chosen... don’t like the word “jerk” substituted for the actual profanity spoken, then something milder can be used instead.

“Does TVGuardian advanced foul language filtering technology work on live TV, such as sports or news?”

No, it doesn’t, but then again, neither does the V-Chip. Just to be clear, Foul Language Filtering Technology *does* work while you’re watching TV and without delays; it just doesn’t work on live programming like news and sporting events. However, the required 6-second delays inherent in most live programming are sufficient for catching any offensive language before it is broadcast.

“How does advanced foul language filtering technology differ from other forms of muting words that may be available?”

Muting a single or partial word defeats the purpose. This is important! First, let's compare Foul Language Filtering Technology to what's often used on TV now. A person on screen says, “Motherfucker!” and here's what it sounds like at home: “Motherf[bleep]!” Let us ask you: Does that now make this program acceptable for a child? I believe most parents would say it doesn't. Some would initially think that muting only the offensive word would be preferred, but you have to keep the intent of the advanced parental control in mind. The beeps and mutes used today do not serve the purpose; frankly, they are only used to avoid FCC fines. Parents using the TVGuardian Foul Language Filtering Technology agree that muting the captioned *phrase* and displaying a profanity-free version of the phrase serves the purpose well. Instead of knowing exactly which word triggered the mute, they are oblivious to it.

This technology can change “Fuck you!” to “Go away!” It does this by altering the closed-captions during the mute. This method not only better serves the intended purpose, and makes it easy to follow the story; it also has other benefits, too.

The FCC explains the Benefits of Closed Captioning in this way, “Closed captioning provides a critical link to news, entertainment, and information for individuals who are deaf or hard-of-hearing. For individuals whose native language is not English, English language captions improve comprehension and fluency. Captions also help improve literacy skills. You can turn on closed captions through your remote control or on-screen menu.”³⁴ Answer the question yourself... is it better for those using the closed-captions to learn English, and children trying to improve literacy skills, to learn “Fuck You!” or “Go Away!”?

“How have customers reacted to this technology?”

Not surprisingly, this tool that helps families enjoy more programming together and keeps them from hearing words that offend them has gained some very passionate fans. Of the literally *tens of thousands* of testimonials we have received in recent years, words like the following are very common:

- **“Having TVGuardian is arguably the best decision we have made regarding entertainment in our home.”** Freeman, Lilitz, PA
- **“It is about the best thing that's happened in TV viewing in the last 20 years!”** Rob Laskin, Santa Barbara, CA

³⁴ October 24, 2007 Survey of TVGuardian Customers. All 2,644 used TVGuardian and only 607 also used the locking and blocking parental controls. 1,246 said they monitor what their kids watch manually. 283 said they had tried the V-chip type parental controls, but found them to be too inconsistent and not effective. 508 said they didn't know about the lock-and-block feature.

- **“We bought TVG several years ago because of our kids, but my wife and I couldn't watch TV without it now.”** Bruce Whipple, Cleveland, OK
- **“If we didn't have TVGuardian, our viewing would be reduced further by 75%.”** Dale, Portage, WI
- **“TVGuardian is the greatest thing to happen to our TV. With five children, we have been able to watch PG movies without the language.”** Beverly, Clarksville, VA
- **“This is the best product I've ever seen. It allows us to watch programs we could not normally watch because of the bad language.”** Elesia Helton, Bremen, GA
- **“If the choice was to have no TVGuardian or no TV period, we would choose no TV. Period.”** Russell McAllister, Richmond, KY

Without going too far down the path of product comparison, I can only wonder: Has locking and blocking technology every inspired such passionate testimonials? It's hard to imagine someone getting that excited about a technology that *keeps* them from watching a program. Once again, advanced foul language filtering *allows* families to watch more programming. Not surprisingly, when we polled a sampling of TVGuardian technology customers, less than one out of four of them used the V-chip type locking and blocking technology.³⁵

“How was it first received?”

Gary Shapiro, President of the Consumer Electronics Association, upon seeing the prototype of the TVGuardian technology for the first time at the 1998 CES, the world's largest consumer electronics show, stated, “If I had known about this earlier—Vice President Gore and I would have been telling everyone about this instead of the V-Chip!”³⁶ He recognized that Foul Language Filtering Technology was more advanced than the V-Chip technology that had just been mandated, but it was too late to do anything about it. Twelve years have passed. Is there any question the industry might need some encouragement?

Shortly after hearing that comment, TVGuardian went to market, and even without Vice President Gore's help, it did quite well! Although, it did take a little while to get some momentum going. We were groundbreakers—the first and only technology on the market that could actually filter out offensive content, while you watched. People didn't believe it at first. They had not seen it in action and they didn't have any friends or family with one. Many thought it was some kind of scam. They couldn't fathom how it could work. We couldn't show a demonstration of it on TV commercials because we couldn't get approval from the content owners to show clips. We tried to pay the license fees but were turned down. That made our

³⁵ October 24, 2007 Survey of TVGuardian Customers. All 2,644 used TVGuardian and only 607 also used the locking and blocking parental controls. 1,246 said they monitor what their kids watch manually. 283 said they had tried the V-chip type parental controls, but found them to be too inconsistent and not effective. 508 said they didn't know about the lock-and-block feature.

³⁶ TVGuardian booth at the 1998 Consumer Electronics Show in Las Vegas; account corroborated by a number of witnesses.

appearance on the Home Shopping Network a little awkward! Telling people TVGuardian filters out the offensive language isn't quite as convincing as actually showing them the technology in action.

First it was sold as an add-on hardware solution—a small box that you could connect between your TV and cable/satellite box or a VCR tuner. At a retail price of about \$99.00, we sold over 400,000 of these through Wal-Mart and other outlets. Then the feature was built into DVD players, VCRs and Combos made by such companies as Sanyo, Magnavox, RCA, Memorex, Polaroid and Disney. Over twelve million DVD players with TVGuardian built in have been sold to date.

Taking a random sampling of 100 of the nearly 10,000 comments filed on the FCC's website in response to this Notice of Inquiry, it appears that over 98% of them referred specifically to TVGuardian and 100% of those were in favor of the technology. A more detailed tallying may reveal variations, but for the most part, the support seems clear.

Here are just a few of the comments posted on the FCC website:

- **“Families are willing to pay a few extra dollars to have this technology but only if it is easily available.”** Daniel Ormsby, Lindon, UT
- **“If people are truly free in our society, we should have available to us the ability to listen and see the things that are according to our own personal beliefs without having some groups ‘controlling’ the different venues of communication and entertainment.”** Rhonda Shrum, Springfield, OR
- **“It is unacceptable to be denied the ability to use the technology that is in existence to limit the foul and offensive language used on TV.”** Kindra Neal, Great Mills, MD
- **“We normally would not be able to watch 99% of what we are able to view with TV Guardian.”** Pat Guerra, Calgary, AK
- **“We DEPEND on TVGuardian for our viewing protection.”** Gary and Jeanne Osborn, Cedar Hill, TX
- **“I won't have a TV without one!”** James Conner, Brownsboro, TX
- **“If Hollywood has the right to put the foul language in the shows, I should have the right NOT to hear it.”** F. Kieffer, Shawnee, OK
- **“There are NOT ENOUGH products on the market with this wonderful technology.”** Kiperly Coley, Huntsville, AL

- **“I strongly encourage the FCC to adopt laws that would require all or most media devices to have filters installed on them to eliminate abusive language. I would be willing to pay for a filtering system on devices such as DVD players and television or monthly fees via cable/satellite boxes.”** David Nichols, Edgewood, NM
- **“I wish the FCC would help more than they do in this area so that the consumer had more options in this area.”** Mark Hendrix, Plymouth, NC
- **“I cannot watch television without it... It is the single most important piece of equipment in my home.”** Brian Jackson, Doe Run, MO
- **“It's an investment into the futures of our children.”** Jack Perry, Conroe, TX

Both the Parents Television Council and the American Family Association noted the value of the TVGuardian advanced foul language filtering technology. Together these two groups represent nearly four million Americans.³⁷ The AFA recently wrote: "Cable and satellite companies should give parents the option of using these parenting tools just because it's good business. This technology will even increase profits for them since filtering out language makes more TV shows and movies OK for family viewing."³⁸

So we have a technology that provides a positive, practical alternative for parents who want to be able to filter out objectionable language from their TV viewing experience. And it can be implemented into a vast array of platforms and devices very easily. Remember, this is a software solution...It can be downloaded into existing hardware...It takes up a very small amount of memory space once it's downloaded...And the entire sub-structure on which it relies—closed captioning—has already been built. That makes this a ready-to-go solution.

As Senator Mark Pryor said in support of the Child Safe Viewing Act, "Today's technology to protect children from indecency goes above and beyond the capabilities of the V-Chip. It's time for the FCC to take a fresh look at how the market can empower parents with more tools to choose appropriate programming for their children. This bill is a pragmatic, sensible approach where parents, kids and technology can all benefit."³⁹

For media companies to decide to offer this technology to parents should be an easy decision then, right? Let's find out...

V. TV Providers Are Preventing Access to Advanced Profanity Filtering Technology

When visiting Washington recently, we crowded nearly 25 meetings, interviews, presentations and speeches into the space of just four days. Having done this for a while now, we've grown quite accustomed to answering the questions that come our way. But during this last trip, there was one question that kept popping up that we still couldn't find a good answer for:

³⁷ Sources: www.afa.net and www.charitynavigator.org, accessed April 10, 2009.

³⁸ Monica Cole, Director, OneMillionMoms.com, a project of the American Family Association.

³⁹ <http://pryor.senate.gov/newsroom/details.cfm?id=303939&>

“Why haven’t the cable industry and manufacturers adopted this technology?”

Certainly it hasn’t been for my lack of trying! In Consumer Electronics we’ve met with over 150 executives...in 91 companies...and 60 cities...for a total of 334 meetings. Of those 91 companies, seven chose to implement the TVGuardian technology for DVD players.

More recently, in the Cable, IPTV and Satellite industry, we’ve met with nearly 40 executives...in 20 companies...and 18 cities...for a total of 85 meetings. Of those 20 companies, only one has given us a tentative yes. With 85 meetings in the pay-TV industry it’s obvious that we’ve met with some companies multiple times—some more than a dozen times.

The time it’s taken to conduct these 400 meetings? Nearly twelve years.

After a demonstration, many employees within these companies responded with comments like, “Wow! I’d like to use this in my own home,” but those top-executives with the authority to make it happen, weren’t willing.

We’ve even met with all the major retailers multiple times, trying to get them to push for the feature in TVs and DVD Players. Best Buy, Wal-Mart, Target, Circuit City, Sears and others have seen our faces. Generally, what we heard from these retailers is, “We don’t tell manufacturers to add features like this. If we do then we lose leverage in the price negotiations. We don’t want to be obligated to carry their products because they happened to add this technology. We’ll tell them to look at adding it if it doesn’t change our price, but it is up to them.” We did have some success, but most manufacturers took that comment as meaning the feature isn’t worth adding if it adds a penny to the cost. In fact, during a meeting with Sony in Japan, we were told, “It doesn’t matter if there’s demand for this feature. If we spend even a penny for the feature, we might gain a competitive advantage for a year or two, but, then the other major manufacturers will add it and we will just be left with another cost.” Besides, Sony owns a media company, too. Could it be they might not approve?

Why hasn’t the consumer electronics industry put the technology in TV sets?

It may be a cost issue. These companies are actually trying to drive pennies out of their cost. Why add a feature, like Sony said, that may give them a competitive advantage for a couple of years, but then, once competitors add it, they’re only left with a cost?

But maybe there is more to it than just cost. In a May 6, 2006 article written by CEA president Gary Shapiro for *Twice Magazine*, Mr. Shapiro states when referring to the V-chip and possible parental controls advancements, “The recent focus on indecent broadcasting *has brought CEA together with the content, cable and broadcast industries* in a voluntary agreement to promote V-Chip usage and *stave off proposals to impose design mandates on CE products*. CEA asks retailers and manufacturers to promote consumer awareness of the V-chip.”⁴⁰

Did I read that right? Did he say the CEA, together with the content providers, cable and broadcast industries, reached an agreement to stave off proposals to impose design mandates on

⁴⁰ See. <http://www.twice.com/article/CA6332616.html>

CE products? Those proposed design mandates had to do with advanced parental controls, right? Sounds like every major player in the business of providing media to the public, and the devices that play it, will do anything they can to keep these tools from the public. At the very least, they're not going to make the tools easy to find or easily accessible to those that demand them.

In looking at those results, there must be a logical explanation, right? One must conclude that these companies either (1) don't care about America's families, (2) a strong enough business case can't be made for adopting this technology, (3) customer demand simply isn't there, or (4) maybe they're *afraid* to do it. Let's look more closely at each of these possibilities...

“Do the media companies care about America's families?”

Let's ask them.

The consumer electronics industry writes: “In conjunction with rising concerns over indecent television programming, *CEA again is taking a leadership role...*”⁴¹ (emphasis added).

The cable industry says: “The cable television industry has taken a very clear position: *our customers should have complete control over what they view in their homes, and we're going to help them in any way we can to achieve that goal.*”⁴² (emphasis added).

So far, so good, right? But to check the veracity of those statements, not much research is needed. One need simply ask these industries, “If that's all true, why aren't you offering parents advanced foul language filtering technology?”

“Is there a strong enough business case?”

Since Comcast, Cox, Time Warner, Dish Network, DirecTV and the like are all bottom-line companies, perhaps the business case for implementing advanced foul language filtering simply isn't strong enough. Let's look more closely at that...

In 2007, TVGuardian, LLC commissioned an independent survey by the Qualtrics organization in which 1,291 people from across America were randomly surveyed (Appendix A). Qualtrics does work for a number of Fortune 500 companies, including Apple, Microsoft, Cox Communications and Verizon, plus educational institutions such as Stanford and Yale. The margin of error for this survey was plus or minus 3%. We asked them to find out if adding advanced profanity filtering technology to the major cable and satellite systems would help or hurt the bottom line of those companies. Here's what we found out:

- **Most parents are offended by the language on TV.** Fully 70% of parents with children at home felt uncomfortable with the language on TV and in movies; overall, including families without children in the home the number uncomfortable with the language was still 62%.⁴³

⁴¹ CEA website under “V-Chip Technology,” <http://www.cea.org/AboutCEA/CEAInitiatives/3532.asp>, accessed April 10, 2009.

⁴² CTPAA Briefs, “What to do about INDECENCY? Give Customers Control,” Vol. 1, Issue 3, June 2005.

⁴³ Nationwide survey by Qualtrics, March, 2007.

- **Customers who currently don't have pay-TV are more likely to come on board when language filtering is available.** 38% of those without cable or satellite would be more likely to subscribe if the offensive language were removed.⁴⁴
- **More customers will choose premium channels when language filtering is available.** Fully half of those uncomfortable with the language on TV would be more likely to purchase premium channels if they could filter out objectionable words.⁴⁵
- **More customers will choose pay-per-view programs when language filtering is available.** Over 40% of those offended by foul language would order more pay-per-view programs if they knew they could do so without having to hear obscene words.⁴⁶
- **Customers will even switch cable or satellite providers to get language filtering.** More than half of those who are uncomfortable with the language on TV say they would even consider switching providers if another provider offered foul language filtering.⁴⁷
- **And finally, customers are less likely to watch programs after being informed of the offensive content, *unless they have the tools to filter that content.*** Under our current system, parents are provided education about content and then given only the option of blocking out that program in its entirety. The logical conclusion here is that the more education provided, the less likely they will be to watch certain programs, and the data supports this theory. That means revenue decreases for pay-TV as the industry better informs their subscribers of the content. But when language filtering is available, viewers said they would be able to watch *more* programming after learning of the content.⁴⁸

Let's summarize those results briefly, shall we? If advanced foul language filtering were available... Customer satisfaction of parents would be increased by as much as 62% or more overall... More new customers would subscribe... More existing customers would pay for premium channels... More would purchase pay-per-view programs... Folks would even switch providers and go to a company that offered language filtering... And the more customers learn about the specific content of programs and were given the tools to filter some of that content, the more likely they are to choose even more programming.

The result? *More money!* Applied to a company the size of Comcast or DirecTV, the end results could literally bring *in tens—if not hundreds—of millions of additional dollars per year.* The margin of error in this survey was 3%, but even if the numbers were off substantially once applied in the real world, they could still pay for this technology many times over in the first year alone!

⁴⁴ Ibid.

⁴⁵ Ibid.

⁴⁶ Ibid.

⁴⁷ Ibid.

⁴⁸ Ibid.

Once we received the results of this survey, we were ecstatic. It seemed that bringing the cable and satellite companies on board now would be a breeze. After all, we've always been told in sales that if you can show the customer they can make money with your product, you've got a sale. All we needed to do was show them these numbers and offer our technology at a reasonable price, which was exactly what we did. Actually, the price we offered them was *more* than reasonable. In an industry where the average monthly bill is over \$80.00⁴⁹, we were asking for 20 cents per set top box—not per month, but *per year*. That would boil down to about a penny and a half per customer per month. We're not kidding when we say we've offered this technology for pennies!

We offered those prices to every major satellite, cable and telco company in America and they turned us down. They told us they didn't want to add a single penny of cost to their boxes. So we did the only other thing we could think of to accomplish our goal of helping America's families: We lowered the price. To how much? How about free?

Here was our new offer: "Add this technology to your systems for free. We'll even assist with the engineering work for free. Then you charge only those customers who want to pay for it, and we'll split the revenues with you 50/50. Oh, and if it does not prove to be successful for you? Then you can keep 100% of the revenues."

Obviously that was a price they couldn't refuse—get this proven technology for free and we'll guarantee you'll make money off of it? How long do you think it took the major cable and satellite companies to accept an offer like that?

We're still waiting.

"Is customer demand there?"

All right, we must be missing something. Maybe the customer demand isn't there. Or maybe customer demand is there but the major cable and satellite providers just don't *know* about it? So, we asked cable and satellite customers to tell their providers if they'd like to see advanced profanity filtering made available. We couldn't contact *all* their customers, of course, but we asked who we could. In the space of about a month, over 15,000 customers wrote their cable and satellite providers to request TVGuardian!⁵⁰ Cox Communications reported that at one point they were receiving over 1,000 per hour!⁵¹

Take a look at just a few of these 15,000 requests from cable and satellite customers:

- **"Please, please, offer TVGuardian on your cable service soon. I would take more of your channels, for example, HBO, which I avoid only because of the foul language."** Robert, Jacksonville, PA, Comcast customer

⁴⁹ FCC Statistical Report on Average Rates for Basic Service, Cable Programming Service, and Equipment, 01/16/2009

⁵⁰ Originals on file at TVGuardian, LLC offices in Rogers, AR.

⁵¹ Email from Cox Communications, October 24, 2007.

- **“Any cable or satellite provider that offered TVGuardian would be the reason I would switch providers. A company that cares for all his customers is a company I would like to hire.”** Jamel Hamka, Powell, TN, Comcast customer
- **“We miss more than half the programs we want to watch just because of the language.”** Shirley Lucas, Pacifica, CA, Comcast customer
- **“You guys are all about choices. I will surely consider the availability of TVGuardian when I next choose between cable and satellite providers.”** Robert Grathwal, Bridgewater, FL, Comcast customer
- **“Please, please, please give me the freedom to choose what my kids hear.”** Josh Carey, Oklahoma City, OK, Cox Cable customer
- **“I would love to see my PAID program provider offer all programs with the ABILITY to filter the foul language coming into my home.”** Randy, Grand Blanc, MI, DirecTV customer
- **“This one product alone would convince me to stay with you as a customer. If your competitors offered it, I would be forced to switch my service.”** M. Scott Knuckles, Garden City, NY, DirecTV customer
- **“We REFUSE to pay for premium channels because we will not watch movies without a foul language filter. Until a foul language filter is provided we are very happy with basic satellite service.”** Edward Shelton, Inglewood, CA, DirecTV
- **“I would think much more highly of a company that was willing to take at least *some* responsibility for well being of our country's children. I would also be more likely to recommend that company to others.”** Joyce, Bessemer, AL, DirecTV customer
- **“Harsh language is the reason I don't get the premium movie channels.”** David, Alexis, NC, DirecTV customer
- **“Dear DirecTV, We enjoy your service, but not the swearing. We have little ears around and want to have a family friendly atmosphere at TV time.”** Rudy Di Giovanni and Family, Chino, CA, DirecTV customer
- **“It isn't enough to offer parents channel blocking capabilities. Parents and children alike would appreciate the opportunity to filter inappropriate and completely unnecessary language found in more and more shows and movies.”** Matthew Mitchell, Matthews, NC, Dish customer
- **“I represent millions of moms who only want the best for their children!!”** Ann West, Lamesa, TX, Dish customer

- **I beg of you please to take on the TVGuardian service to keep my business.”**
Michael Gardner, Casper, WY, Dish customer
- **“We should at least have the option. After all, *I’m paying for it.*”** Steven, Oakes, ND, Dish customer
- **“I would pay extra to have this service. Then maybe I could get something else besides the family package.”** Deborah Kuch, Tualatin, OR, Dish customer
- **“I’m seriously considering getting rid TV altogether, due to the continuing and difficult-to-monitor situation with bad language.”** Tammy, Aledo, TX, Dish customer
- **“If it were possible to get TVGuardian on Dish you would have me as a customer forever. I would even pay a premium for the service. I have had this product in my home and we love it.”** Jeffrey Swanson, Sandy, UT, Dish customer
- **“We have considered giving up television altogether, but with TVGuardian available, we have not. It would be absolutely wonderful if Dish Network offered it built in.”** Mark, Murrieta, CA, Dish customer
- **“I would change to whoever is first on the market if my current provider is not the first.”** Stephen, Cragford, AL, Dish customer
- **“I recently went to a smaller package because I was tired of the filth in my home.”** Michelle Willis, Bakersfield, CA, Dish customer
- **“I will not renew my contract with Dish Network If they don’t provide this service.”** Amelia, Altamonte Springs, FL, Dish
- **“We just didn’t think it was worth inviting a foul-mouthed stranger to sit and talk to us from the corner of our living room. Come on DISH, you can do better! TVGuardian could fix all that.”** Debbie Grove, Smithsville, KY, Dish customer
- **“My willingness to subscribe to your service would be greatly affected by your willingness to offer this service.”** Eric, Kirtland, NM, Prospective Dish customer
- **“If I had to choose between two cable companies, I’d certainly choose the one with TVG, hands down.”** Vicki Copeland, Harvest, AL
- **“WHY, WHY, WHY, WHY, WHY, WHY, WHY are you not doing this already? Kids do not need to be exposed to such bad language.”** Danny Phillips, Lumberton, NC, Time Warner customer

- **“Offering TVG would seem to me to fit right in with the philosophy of offering a large variety of options to appeal to the most market share.”** Doug Baker, Loveland, OH, Time Warner customer
- **“If we are willing to pay for a service, why would you NOT be willing to provide it? Please allow us to enjoy what others enjoy without the offense.”** Kevin Robinson, Kenosha, WI, Time Warner customer

How did the cable and satellite companies respond to all these requests? The largest cable company in America asked us to stop sending them; the rest of the companies just ignored them altogether.

So let’s try another angle. Maybe there are thousands of die-hard TVGuardian customers out there who *say* they’d like advanced profanity filtering, but really they don’t. What if we were able to check with the retailers and installers, then? You know, the men and women who are on the forefront of the pay-TV industry—the ones who are out in people’s homes, actually selling the systems and installing them all day long. Surely *they’d* have a grasp on what customers want...

“What about those closest to the customers—the retailers and installers?”

In 2007 we were invited to the annual convention of one of the top-three cable or satellite providers in the U.S. They even had us do a test-integration of our software into their latest HD DVR Receiver platform to be used as a demonstration—only ten hours of work and our code was embedded and working. At their request, we were to stay in their main booth and hand out survey cards to their installers. Their logic was, “The retailers and installers know the customer best. Let’s ask *them* about this technology and see what they say.”

Here are the results from the 675 retailers surveyed:

- **“We would like to see it offered.”** 96% of installers said they would like to see their company offer the TVGuardian technology as a standard feature.
- **“It would increase sales.”** 87% said TVGuardian would help them close more sales.
- **“We would gain new customers.”** 84% said it would help them retain current customers.
- **“Customers will spend more.”** 94% said customers would subscribe to more premium movie channels and purchase more video-on-demand movies.

Not only did we gather those numbers, but we gained hundreds of direct comments from the retailers and installers themselves. Here are a few of them:

- **“I hear requests for it all the time. I’ve got several folks I’ve called on for years who won’t subscribe because of the language.”** A retailer/installer from Tennessee
- **“This feature would definitely increase sales.”** A retailer/installer from California
- **“It would be a killer application.”** A retailer/installer from Oregon
- **“We need this because customers have demanded it.”** A retailer/installer from Texas
- **“It’s in great demand among families, and families are the core of our business.”** A retailer/installer from Montana
- **“For people that enjoy watching TV but do not want the foul language, it would be marvelous.”** A retailer/installer from Arkansas
- **“I’ve talked to a *lot* of customers who are frustrated that they can’t lock out just the bad language.”** A retailer/installer from Illinois
- **“There’s just so many of us that don’t want profanity in our homes. I know most of my friends wouldn’t want it, and a lot of my customers wouldn’t, either.”** A retailer/installer from Florida
- **“I’ve had it in my own home for five years. It’s great. It’d be nice to add it to the parental controls that [our company] has for the protection of our kids.”** A retailer/installer from Illinois
- **“It would be a good selling tool for families—the current ratings system doesn’t work.”** A retailer/installer from North Carolina
- **“I’m a firm user of TVG myself. It keeps a majority of the foul language out of my home. This would help me close more than a few sales, and probably even go back to the customers I have and get upgrades. I hope they take everybody’s comments and really take action on this.”** A retailer/installer from Virginia
- **“It would benefit *us* if it were an option. People would prefer this over the ratings lock.”** A retailer/installer from Kentucky
- **“I personally believe this is a ‘must-have’ for my family or any parent.”** A retailer/installer from Ohio
- **“Personally I’ve got five kids, and I’d trade every receiver in the house just to have one with TVGuardian in it.”** A retailer/installer from Texas

- **“The ability to keep you children away from bad language is something *every* provider should offer, not just ours.”** A retailer/installer from Oklahoma
- **“There are more people out there who are concerned about the language than they think.”** A retailer/installer from New York

Again, we had results that overjoyed us. A major cable/satellite provider asked us to query their retailers and *96% of them* said they wanted our feature?! Not only that, but we gathered literally *hundreds* of glowing comments like the ones above. Help us out here: Were we being too gullible? Somehow we figured 96% was a high enough percent for this major provider to justify adding the feature. We had already successfully tested the software in their HD DVR receiver, too. One executive said they could have it *ready to download into the receivers already in homes within two months*.

But they didn't.

In 2008, we returned to that same convention and got our own booth this time. We handed out bright yellow buttons with the words, ***“Where the *BLEEP* is TVGuardian???”*** Hundreds more retailers and installers signed a petitions for their company to implement this feature. But in the end, our question remained unanswered.

Finally, they did answer our question as to whether or not they would offer foul language filtering technology to their customers. In August of 2008, a meeting was scheduled with the Chief Marketing Officer of that organization. On the day of our meeting, after catching a 6:00 a.m. flight, going to their city, renting a car and driving out to the meeting, we arrived at their headquarters. As we were pulling into the parking lot, an email came on the Blackberry. The Executive's assistant said they decided to cancel the meeting—*an hour before it was to take place*. We could see their office window from my car! But they were firm about canceling the meeting. And they never rescheduled. We had our answer at last.

The time it had taken to court that customer? Three years.

How did the other leading cable and satellite companies respond? One of them put together a series of focus groups, but then went out of their way to sabotage the results! But don't take my word for it; take a look at the movie clip they used. First, some background: In preparation for these focus groups, they asked us to provide specific movie clips they could use to demonstrate the language filtering technology on. They wanted to see if the language in most PG and PG-13 movies was offensive to the members of the focus group. So, at their request, we sent no less than eight 10-15 minute long movie clips in advance, all PG and PG-13 movies with an average amount of profanity used. Instead, they chose their own clip, and here, is ScenIt.com's description of the scene from “Catch and Release” that this company chose to test *language sensitivity*:

*“After Gray retreats to an empty bathtub to get away from her fiancé’s wake (the shower curtain is closed), she hears a couple enter the bathroom. We then see Fritz and a stranger having sex standing and clothed (she on the sink or something similar and him between her legs). The view is from the torso up, but movement is seen and their sexual sounds are heard, including her repeatedly stating, “Sock it to me!” This is played for laughs, including when the woman gets a leg cramp and stretches it out into the bathtub area, unaware that Gray is there. They then quickly finish, she says thanks, he replies she’s welcome, and that woman then leaves.”*⁵²

This sex scene lasts for a full 60-seconds with “Sock it to me!” repeated over and over again with each thrust. After the sex scene, the woman writes her name and phone number on the man’s hand and leaves the room. He rinses the woman’s phone number off his hand, then lights up a marijuana joint.

In other words, to query their viewers as to whether the language on TV bothered them, they chose a soft porn scene! Then they asked, “After filtering out the foul language, would you let your kids watch it?” TVGuardian did filter out the foul language, but after watching that scene, of course the focus group is going to say, “Well, the language is a problem, but those sex scenes, wow, we’ve really got to do something about those!” And so this major cable/satellite provider was able to successfully use the focus group results to claim that language wasn’t a big enough concern for their customers. Even with the attempt to sabotage the focus group study, most in the groups *were* able to imagine how the technology would work with *appropriate* content and still wanted it, but others could not get that sex scene and drug usage off their minds.

Don’t believe they would intentionally do this? This is the same company that asked us not to send them the comments and requests from their own customers.

And there’s one other top executive we can never forget. We mean top, *top* executive—we’re talking the Vice President of a cable or satellite company with over 10 million subscribers. We sat in his expansive boardroom overlooking a million dollar view of the city below. We gave him all the data we had gathered and showed him a demo of the technology. He leaned way back in his chair, sighed, and said, “Guys, *it’s not sexy.*”

Go figure!

And the rest of the leading cable and satellite companies? They all said no, too. Wait, let us correct that: They each said no *at least twice*. Remember, our task to bring this technology to America’s families has taken us through over 400 meetings. Most of the leaders have had more than one chance to say no to us, and have taken full advantage of the opportunity to do so!

Let’s recap the above. We’ve just seen the data proving this technology is a money-maker for pay-TV. Their own customers are clamoring for it. Their own *retailers and installers* even want it offered. And we’re trying to give it to them for free. As well as guaranteeing the results.

⁵² http://www.screenit.com/subscribers/movies/2007/catch_and_release.asp#sn, accessed April 11, 2009

So why have they said no?

As said earlier, this was the toughest question for us to answer in Washington. We always thought companies were in business to make money, and if they could help improve the lives of their customers, that was an added bonus. Were we wrong? We don't know. What we do know is this: Based on all the data we have, the vast majority of Americans would like access to advanced foul language filtering technology. Exactly how many is anyone's guess. But it's enough to matter. And enough to make a business case for offering it.

Nearly 90% of all Americans receive their TV signals through a cable or satellite provider with incumbent cable and DBS operators providing 97% of the service to the pay-TV households.⁵³ Even with AT&T and Verizon entering the business, they still do not pass by much of the country's households. Most markets still only have three choices; the currently available cable provider, Dish Network and DirecTV. Many in rural areas can only choose between Dish Network and DirecTV. A handful of decision makers—a *very small handful of key decision makers*—has the power to offer or withhold that technology from the vast majority of Americans.

So far, they have chosen to withhold it.

Could the pay-TV CEO's be scared to offer advanced Foul Language Filtering parental controls?

That's not so farfetched. Actually, several cable, satellite and telco executives have commented about a concern they have with their *content provider contracts*. There's no question of the legality of the technology. However, some content provider contracts, so we're told, have clauses preventing them from delivering altered content. Even though they would still be delivering the video content in its original, unaltered format, the content providers might take issue with the pay-TV providers offering technology that gives their subscribers the ability to filter out undesirable words and phrases. If this is the actual hurdle, *only legislation specifically requiring foul language filtering technology that uses the closed-captions to detect and mute offensive language, and modifies the closed-captions by replacing the offensive text with non-offensive text of similar meaning, will get past these contractual matters*.

None have been willing to go first. Is it out of fear or maybe because they've all agreed not to offer these tools? In fact, several have stated they want to be second, but... if all of them wait to be second there will never be a first!

Are we exaggerating about the power of these companies?

In the words of Acting FCC Chairman Michael J. Copps, "Ever since I arrived at the Commission six years ago, I have been deeply concerned about increasing concentration in the cable industry. I simply can't see how American consumers benefit when a handful of vertically-integrated media giants have so much control over so much content."⁴⁵

⁵³ FCC's Annual Assessment of the Status of Competition in the Market for the Delivery of Video Programming. Thirteenth Annual Report. Released January 16, 2009. MB Docket No. 06-189.

James Steyer, head of Common Sense Media, writes, “The point is that today there are only *five or six* huge mega corporations that dominate the entire global media business.”⁵⁴

Former NBC and PBS President Lawrence Grossman concurs: “While the number of TV channels and media outlets is burgeoning...a few conglomerates, which have no direct responsibility to the American public, wield extraordinary power over the ideas and information the public will receive.”⁵⁵

Ted Turner chimes in, “We do have just a few people controlling all the cable companies in America.”⁵⁶

And James Steyer adds, “To put it plainly, control over the mass media, across all platforms, is increasingly concentrated in fewer and fewer hands.”⁵⁷

At the start of this section, we surmised that there could only be a handful of reasons that the consumer electronics and pay-TV industries have refused to offer families foul language filtering technology, even in cases when it was offered to them for free. They either (1) don’t care about America’s families, (2) a strong enough business case can’t be made for adopting this technology, (3) customer demand simply isn’t there, or (4) maybe they’re *afraid* to do it. In spite of those arguments, we think we’ve shown a strong enough case for implementing foul language filtering technology. But in the end, whether we’ve proven our point or not doesn’t matter. The fact is, they have the power to help America’s families or withhold that help, and they have chosen to withhold it.

Before we look at what can be done about that, let us address one more barrier to the goal of bringing this technology to all Americans: the digital transition.

VI. The Digital Transition Forces Foul Language Filtering Technology Into Obsolescence

What’s changing with the digital transition? The answer: A lot! Closed-captions are broadcast as hidden data within the video. They can easily be read. Foul Language Filtering Technology uses these existing closed-captions to detect and mute offensive language. In the analog, pre-HD world, the closed-captions passed through to the TV’s closed-caption decoder. The TV’s closed-caption decoder, when activated, processed the data and displayed the text as graphic characters on top of the video. Foul Language Filtering Technology could sit between a cable/satellite box/DVD Player/VCR in a dedicated set-top box that would intercept the closed-captions and audio, before it reached the TV. But that’s not the case in the DTV world.

Cable, satellite and IPTV (e.g. AT&T and Verizon) receivers process the closed-captions for DTV/HD inside their own box—*closed-captions are not passed through to the TV, therefore, an external Foul Language Filtering Technology box cannot intercept the closed-captions and*

⁵⁴ James Steyer, “The Other Parent,” p. 30.

⁵⁵ Lawrence Grossman, quoted in “The Other Parent,” by James Steyer, p. 33

⁵⁶ Ted Turner, quoted in “All Together Now,” *Electronic Media*, December 15, 1997, p. 14

⁵⁷ James Steyer, “The Other Parent,” p. 32

audio before it reaches the TV. The DTV revolution has forced this invaluable technology for families into obsolescence as an external box. ***Foul Language Filtering Technology has to be built into the cable/satellite/IPTV boxes to work with HD.***

Couldn't the pay-TV industry just start passing the closed-captions through to the TV, thereby, allowing an external TVGuardian box to work? Sounds like a possible solution, but it is not. HDMI cables used for the best HD picture quality do not support closed-captions at all.

Couldn't the industry change the HDMI standard to pass through the closed-captions? This begs the question: Why would the consumer electronics and pay-TV industries rather go to the expense and trouble of changing the HDMI standards instead of just providing their customers the advanced Foul Language Filtering Technology they've asked for?

Remember, the Foul Language Filtering Technology: 1) has been offered to the pay-TV industry for free with a revenue sharing business model; 2) is only 5-10k in size, easily fitting into existing chipsets; 3) can be downloaded over their system into most boxes currently in homes, both HD and standard-definition (SD); 4) is ready-to-go—the data structure (closed-captioning) is already in place—simply add the software and it works; and 5) has proven demand that will ultimately increase profits for the industries.

Doesn't the cable industry now have an OpenCable (Tru2way) platform? Yes they do, but it doesn't help in this case. Closed-Captions can be displayed through the OpenCable platform, but the development tools do *not* currently have a way to read and modify the closed-captions before they're displayed. This would take a very minor revision in the OpenCable SDK, but that is the smallest part of the problem. The biggest issue is getting the cable providers to offer the technology once a True2way application for Foul Language Filtering is ready. We've asked and they've all said no.

What about people that don't have pay-TV? Foul Language Filtering Technology will work for *over-the-air* broadcasts, too, when it is built into the HD televisions. However, having it built into the TV sets will not help those using pay-TV services since closed-captions aren't passed through to the TV from the cable/satellite/IPTV box, as mentioned before. So, the issue here is... why add the feature into every single TV set if only the families without pay-TV could use it? To be honest, there really isn't a great business model for HD Televisions. We would gladly work with the CEA members on a finding solution.

To summarize this section, to work with HD programming with pay-TV, Foul Language Filtering technology must be built into the pay-TV receiver. For those without pay-TV, it must be built into the TV set.

VII. Government Intervention is Needed to Ensure That Families Are Given Access to this Technology

Before addressing the digital challenges in this last section, we were looking at a more human challenge: The fact that the handful of CEO's control TV access to the majority of

American homes through cable and satellite haven't seen fit to offer families advanced language filtering technology.

Could the pay-TV industry be afraid of the content providers and their contracts with them? If so, only legislation specifically requiring foul language filtering technology that uses the closed-captions to detect and mute offensive language, and modifies the closed-captions by replacing the offensive text with non-offensive text of similar meaning, will get past these contractual matters.

Could the media, pay-TV and consumer electronics industries have decided together to do all they can to keep advanced parental controls from the public? The CEA president said as much, and the industry hasn't tried to offer advancements in parental control technology since the government mandated the V-Chip in 1996. It's not like the industry hasn't recognized that technology more advanced than the V-Chip exists. Gary Shapiro saw the prototype of the TVGuardian Foul Language Filtering Technology in January 1998, and the industry even gave it an Innovations Award and the prestigious Best of Show recognition a year later at CES.

Could having the media industry monitoring the ratings that parents depend on be a problem? They have a financial incentive to *not* have programs blocked by the v-chip. You can't blame them for wanting to protect their profits. What advertiser would want to pay for a program that would just be blocked? The Monitoring Board has a Chairman and six members each from the broadcast television industry, the cable industry, and the program production community.⁵⁸ Maybe that is why, in Section 2(b) of the Child Safe Viewing Act, Congress specifically asked for technology that can "operate independently of ratings pre-assigned by the creator of such video or audio programming."

So how can change come about?

James Steyer of Common Sense Media writes, "Significant change will occur from within the media world only when owners and senior executives recognize that shareholder value is *not* the only value that matters."⁵⁹ But what's puzzling here is that the TVGuardian technology *represents both shareholder value and socially conscious value*. We've already seen the evidence earlier in this report: It is undisputed that millions of parents would like access to this technology, and it is undisputed that companies could offer it to them without ultimate cost.

Most Americans still haven't heard of this technology, and things will stay that way unless something is done. It would be nice if the leading cable, satellite and consumer electronics companies would simply step forward quickly and voluntarily *truly* help parents. But until that happens, we may have to rely on the advice of the head of Common Sense Media: "Self regulation alone is not enough, because only some, not all, will act responsibly."⁶⁰

His recommendation? "The fact is, the biggest problems with the media today are rooted in the current structure of the marketplace. And the only institution in our society that has the

⁵⁸ See. http://www.ce.org/shared_files/resources/128VChip_Bucksip.pdf

⁵⁹ James Steyer, "The Other Parent," p. 218

⁶⁰ Ibid., p. 220

power to change this structure fundamentally is government. The federal government...has the power and responsibility to regulate commerce.”⁶¹ And to put it more bluntly, “Government is the only protection that children and consumers have against big business.”⁶²

Wait a second here. Government forcing business to comply with legislation instead of allowing the free market to decide? Heaven forbid!

That’s how the inventor of this technology and everyone else in our company felt for years. At first, we marketed this technology as something good for families that would drive demand for their products. But neither Asian electronics manufacturers nor American pay-TV providers stepped forward to help those families. So we made another business case for the technology—a *strong one*. We showed how they could make money with this technology and offered it to them for free. They still turned it down. If this were just some money-making scheme for us, we would stop at that. “Such is life,” we would say, and we’d move on. But we can’t do that, because we have heard the voices—the voices of tens of thousands of parents who thank us for this family-friendly technology.

Are we to ignore those voices and choose another line of work?

We believe in the free market, but we believe the free market is not a handful of media, cable, satellite, and consumer electronics executives. We believe that every family in America should be given the choice to decide for themselves what level of language they allow into their homes when they watch TV.

Before preceding any, here are two very important points to keep in mind:

1. We are not asking the government to pay for this.
2. We are not asking big business to pay for this.

Let us explain: Our proposal is that government require businesses to make advanced foul language filtering technology available to their customers. Government would not have to subsidize the cost of this. Nor would business be burdened with ultimate costs. *And it is only fair that the nominal costs of deploying and supporting this technology be borne by only those customers who choose to pay for it.*

As an example, here’s a simplified look at what that would look like in the case of a major satellite provider:

1. Legislation requires the satellite company to give their customers the option of advanced foul language filtering.

⁶¹ Ibid., p. 230

⁶² Ibid., p. 228

2. The satellite company receives the necessary software for free, downloads it into their receiver boxes, and makes it available to families by beaming an upgrade into the boxes in their customer's homes.
3. Any customers who then want to use this technology may access it through their TV and pay a nominal monthly fee to use it. The satellite keeps 50% of that fee—plenty to cover their deployment and billing costs, to use to further promote the feature and to profits from it.

Is this an unreasonable plan? Should we instead devote another 400 meetings to offering this technology to those who control TV access to millions of American families? Or is government legislation necessary? The only better idea I can think of is if the leaders of those companies step forward and voluntarily give families access to this technology

VIII. Conclusion

In the Child Safe Viewing Act, Congress is asking the FCC to take an active step by reviewing “newer, more advanced technologies” to help parents shield their children from harmful content. The TVGuardian Foul Language Filtering Technology is a prime example of such a technology: *It meets every criteria set forth in the Act.*

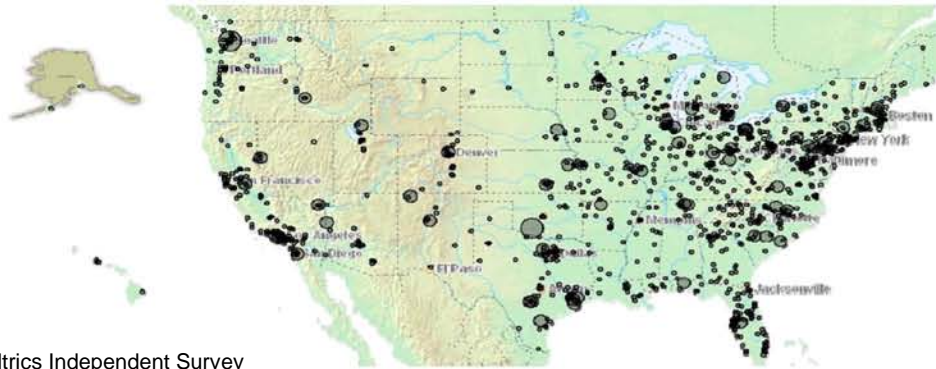
The need for newer technologies like this should be evident by now: Current parental controls are outdated and ineffective and the media industry has simply not been proactive in adopting newer, more advanced technologies. Unless something changes, they will just keep insisting the old tools are good enough.

Advanced language filtering may not magically solve all the problems on TV today, but it does answer one of the biggest problems families face: How to enjoy TV as a family and not get offended by the language. It can solve that problem for them whether they're watching their TV on a standard set, a computer, or even an iPhone. And it's a solution that's ready-to-go; as one satellite executive said, it could be ready to download into existing receivers currently in homes *within two months*.

Our premise is simple and so is the solution: Families should be given the freedom to filter out offensive language when they watch TV in their own homes. Let those who want this technology be given the opportunity to pay for it. If the companies with the power to help those families won't afford them this opportunity, where else do families have to turn but to the government?

APPENDIX A

Independent National Survey Effects of Foul Language on pay-TV March 2007 1291 Sample Size



Qualtrics Independent Survey
1291 Sample Size

Have you ever felt uncomfortable with the language on TV or in Movies?

	All	with Kids	Satellite
Often	18%	21%	16%
Sometimes	44%	49%	50%
	62%	70%	66%

Asked of the 11% without cable and satellite:

Would you be more likely to subscribe if you had the ability to watch TV with the offensive language removed?

Yes	38%
No	62%

Asked of the 62% uncomfortable with the language:

Do you currently subscribe to any premium movie channels, such as Starz, HBO, Showtime, etc?

Yes	34%
No	66%

Would you subscribe to more premium movie channels if you could watch them with the offensive language filtered out?"

	Overall	Of the 48% without Premium Channels
Very Likely	14%	13%
Somewhat Likely	36%	35%
Not Likely	36%	34%
I wouldn't in any case	13%	19%

Would you order more pay-per-view or video-on-demand movies, if you could watch them with the offensive language filtered out?"

Very Likely	13%
Somewhat Likely	41%
Not Likely	43%
I wouldn't in any case	16%

If technology were included in your TV, cable or satellite box that allowed you to filter out offensive language with a 98% average accuracy rate, would you use it?

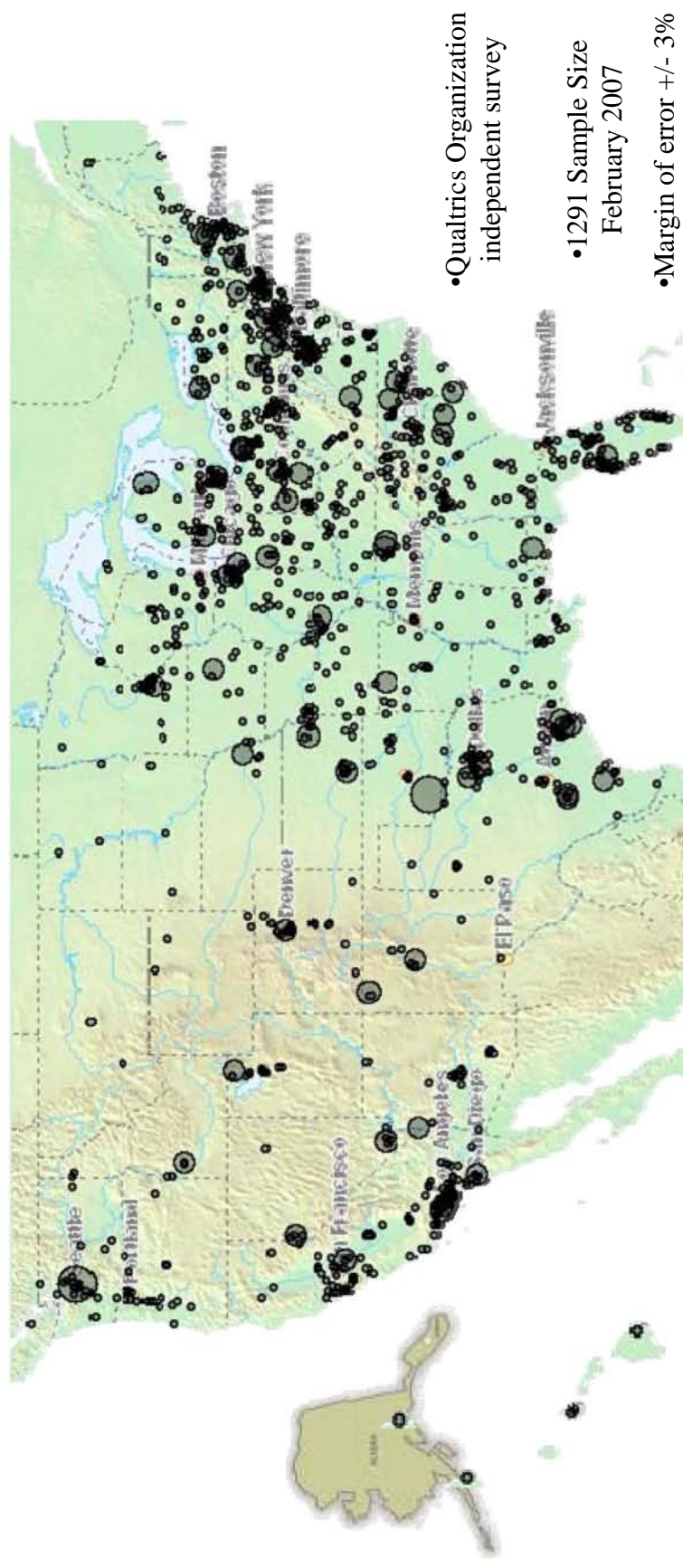
All the time	27%
Most of the time	24%
Sometimes	33%
No	16%

Would you consider switching your cable or satellite provider if another provider offered language filtering on their programs?"

Would Switch	54%
Wouldn't Switch	46%

Effects of Foul Language on the Purchasing Habits of Cable and Satellite Customers

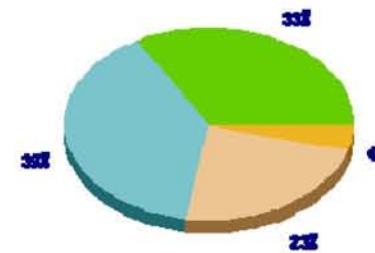
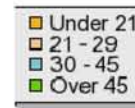
Independent Survey Shows the Impact of . . . Foul Language on Revenue.



Survey Makeup

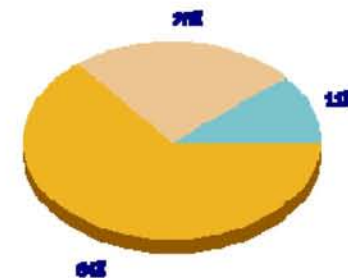
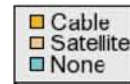
What is your age group?

Age		Percent
Under 21		4.22%
21 - 29		23.29%
30 - 45		39.01%
Over 45		33.46%



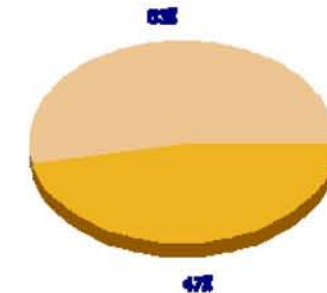
Do you have cable or satellite?

Choice		Percent
Cable		64.17%
Satellite		24.90%
None		10.91%

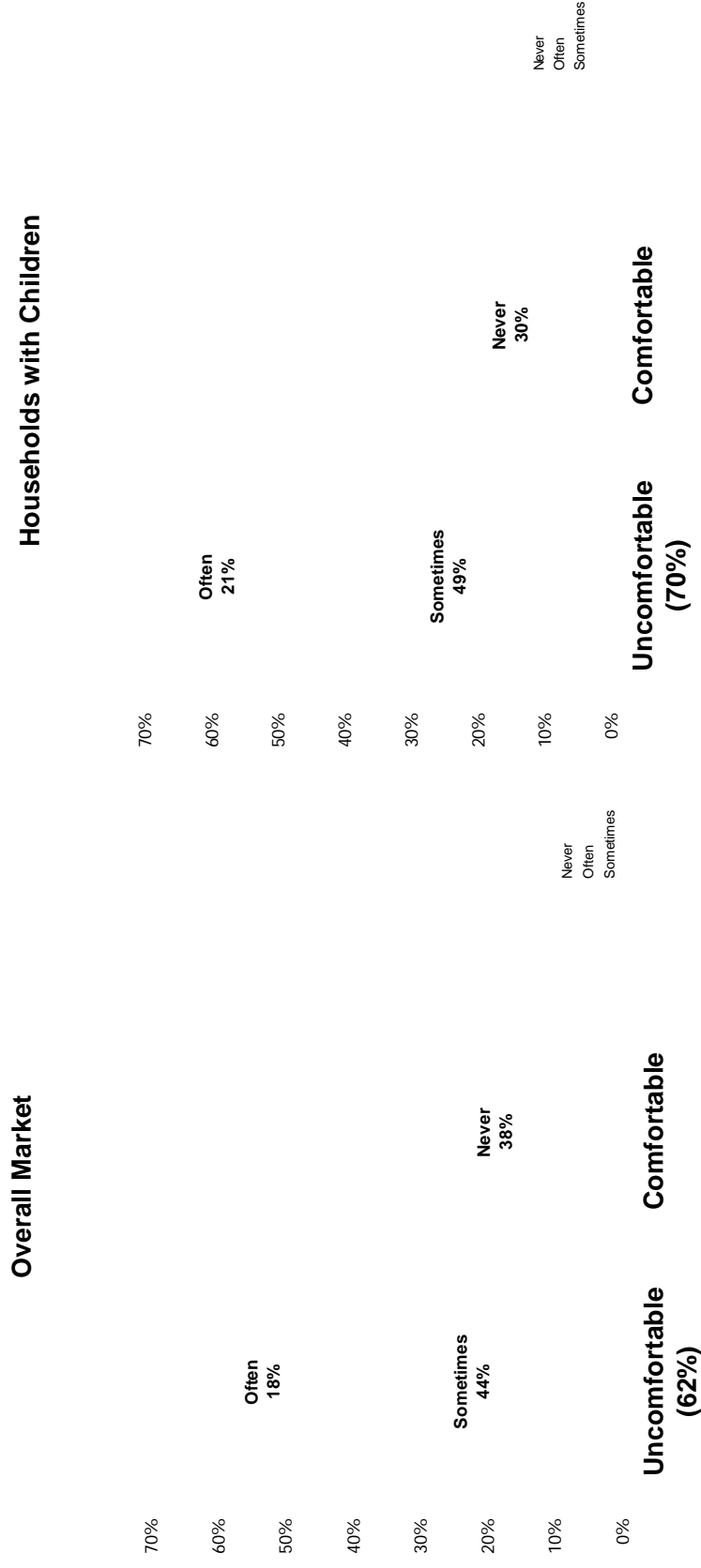


Do you have children in your home?

Children		Percent
Yes		46.98%
No		53.01%



“Have you felt uncomfortable with the language on TV or in Movies?”



As we know, people tend to avoid things that make them feel uncomfortable . . .

Market Expansion

Asked of the 11% that do not have cable or satellite:

“Would you be more likely to subscribe if you had the ability to watch TV with the offensive language removed?”

More likely to subscribe
38%

An overall
market expansion of
4.16%

Assuming 11% currently don't have cable or satellite

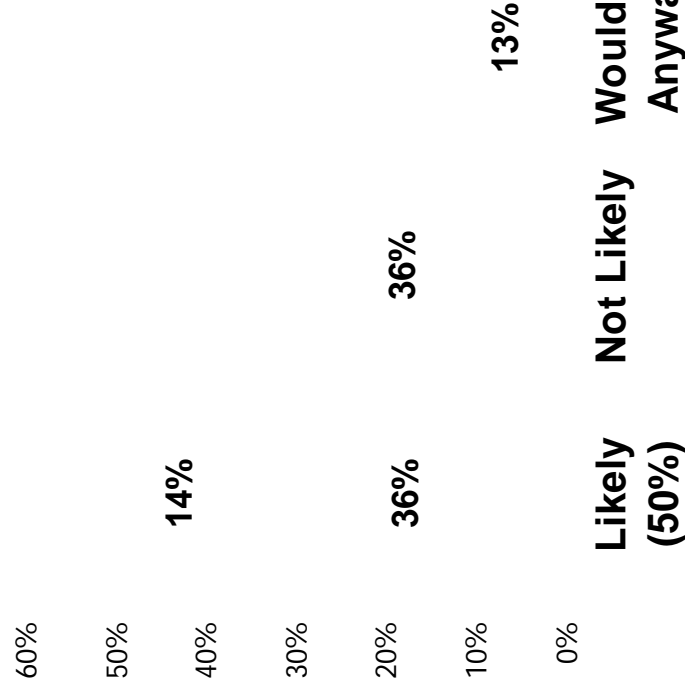
No
62%

Premium Movie Channels

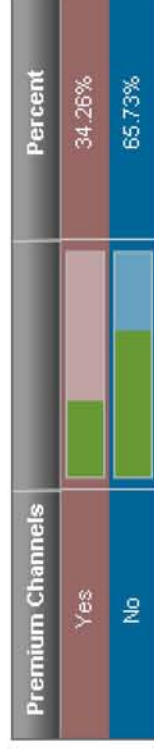
Asked of the 62% Uncomfortable With The Language

“Would you subscribe to more premium movie channels if you could watch them with the offensive language filtered out?”

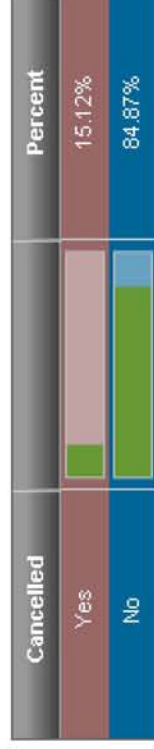
An overall market expansion of 31%



Do you currently subscribe to any premium movie channels, such as Starz, HBO, Showtime, etc?



Have you ever cancelled a subscription to a premium movie channel because of offensive content?



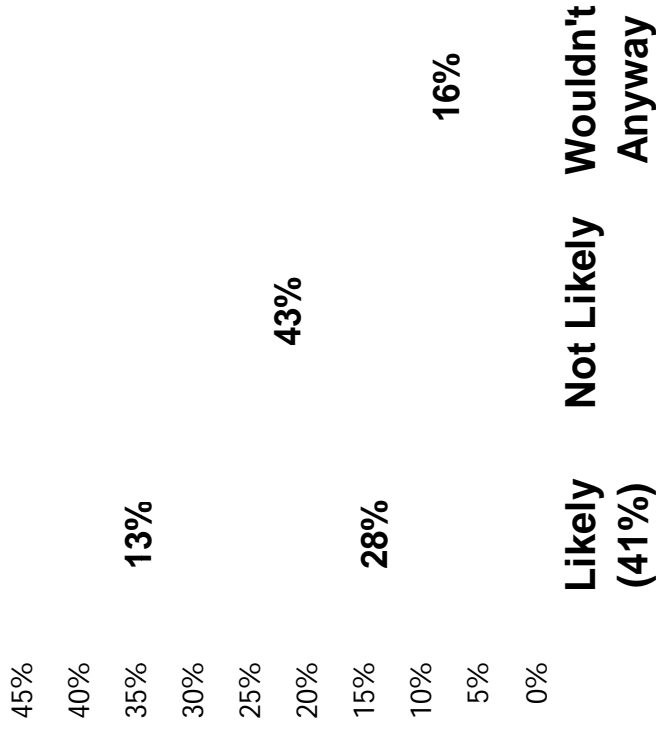
I Wouldn't Watch Anyway
Not Likely
Very Likely
Somewhat Likely

Pay-Per-View and VOD

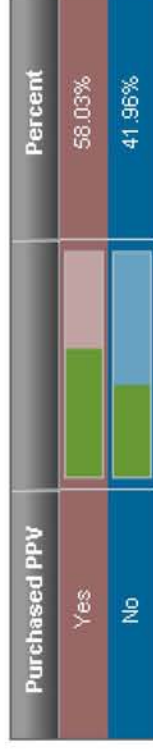
Asked of the 62% Uncomfortable With The Language

“Would you order more pay-per-view or video-on-demand movies if you could watch them with the offensive language filtered out?”

An overall market expansion of 25%



Have you ever purchased a pay-per-view or video-on-demand movie?



Wouldn't Watch Anyway
Not Likely
Very Likely
Somewhat Likely



**What if we give the public
better information about
the content?**

Dr. Doolittle

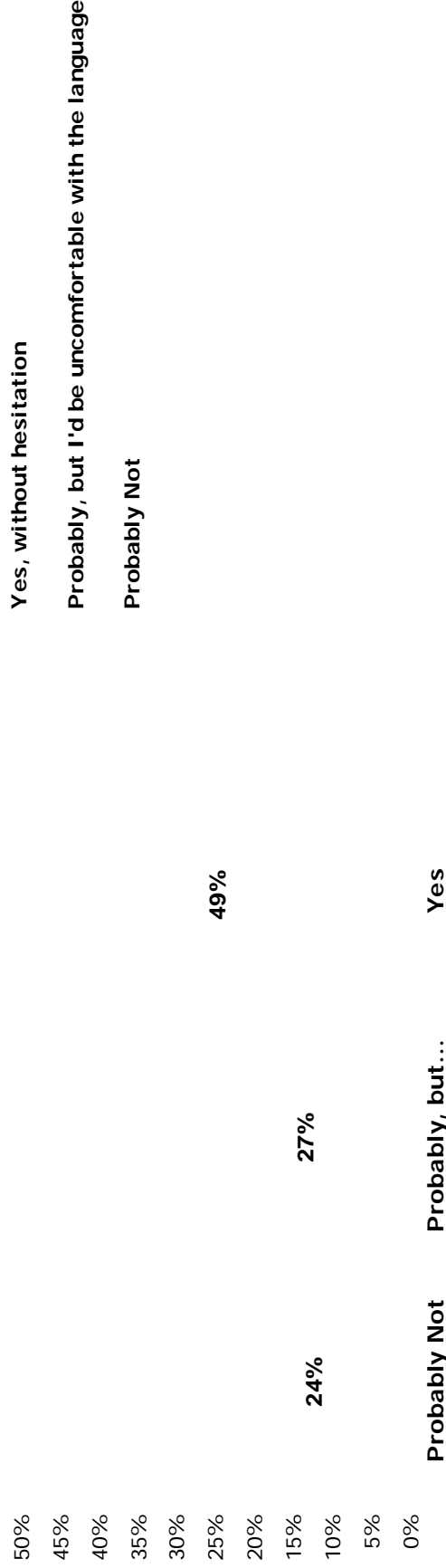
The movie "DR. DOLITTLE" is a PG-13 rated comedy starring Eddie Murphy about a man that can talk to animals. It has no nudity or graphic violence, but has potentially offensive language.

Including at least:

7 asses, 6 hells, 1 damn, 1 crap, and 5 uses of "Oh my God," 2 of "Jesus" and 1 use each of "Swear To God," "Oh Jesus," "Oh God," "Oh my Lord," "My God," and "Good Lord" as exclamations.

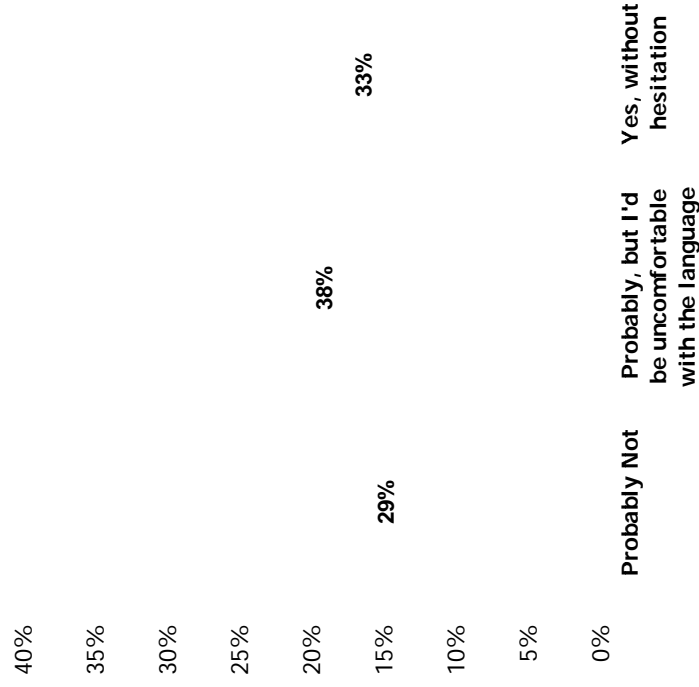
Assuming you've never seen this movie,

Would you watch this movie if it were shown on TV unedited?



Dr. Doolittle

Would you let your kids watch this movie?



Asked of the 29% that would not watch:

How likely would you be to purchase this movie on pay-per-view if the offensive language were filtered out?

**More likely to watch
with language
filtered?
49%**

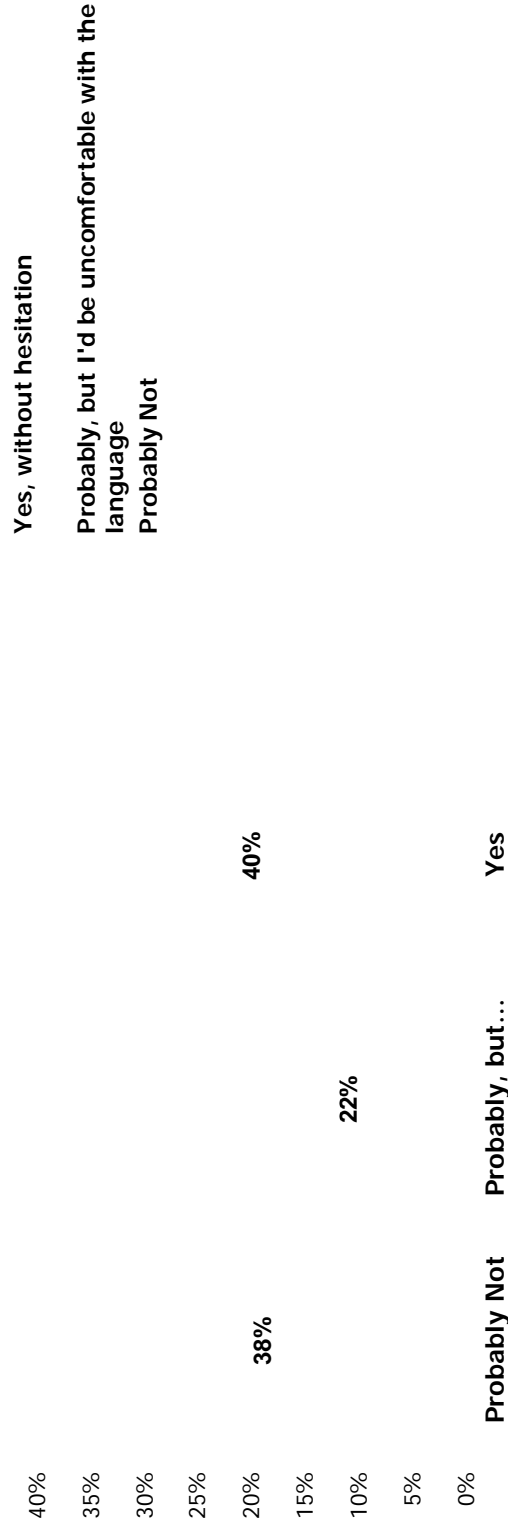
King Kong

The movie "KING KONG" is a PG-13 movie with no nudity or sexual content, but it has action violence and multiple uses of offensive language.

Including at least:

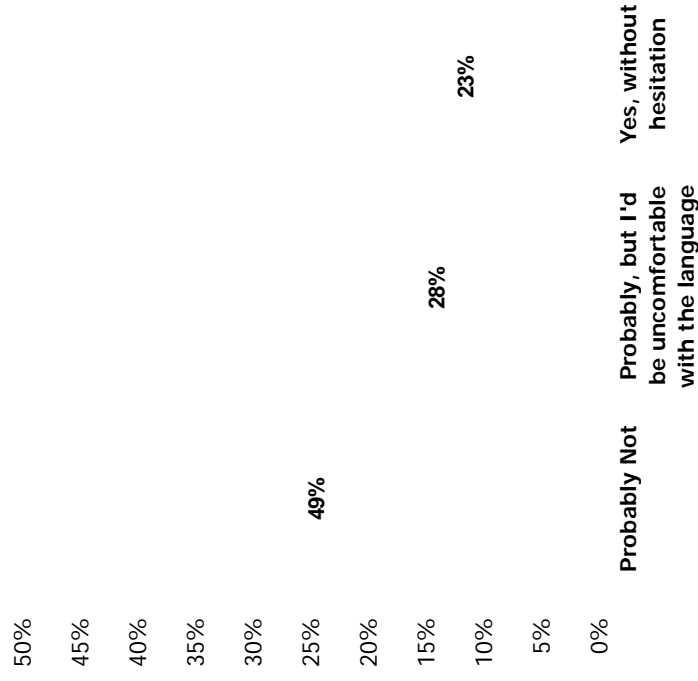
4 hells, 2 craps, 1 damn, 5 uses of "G-damn" 4 of "Christ," 2 each of "For God's sakes," "Jesus" and "Oh God" and 1 use each of "For Christ's sakes," "God," "Good Christ," "Holy Christ," "Jesus," "Jesus Christ," "Mother of God" and "Oh Christ." and others.

Assuming you've never seen this movie,
Would you watch this movie if it were shown on TV unedited?



King Kong

Would you let your kids watch this movie?



Asked of the 49% that would not watch:

How likely would you be to purchase this movie on pay-per-view if the offensive language were filtered out?

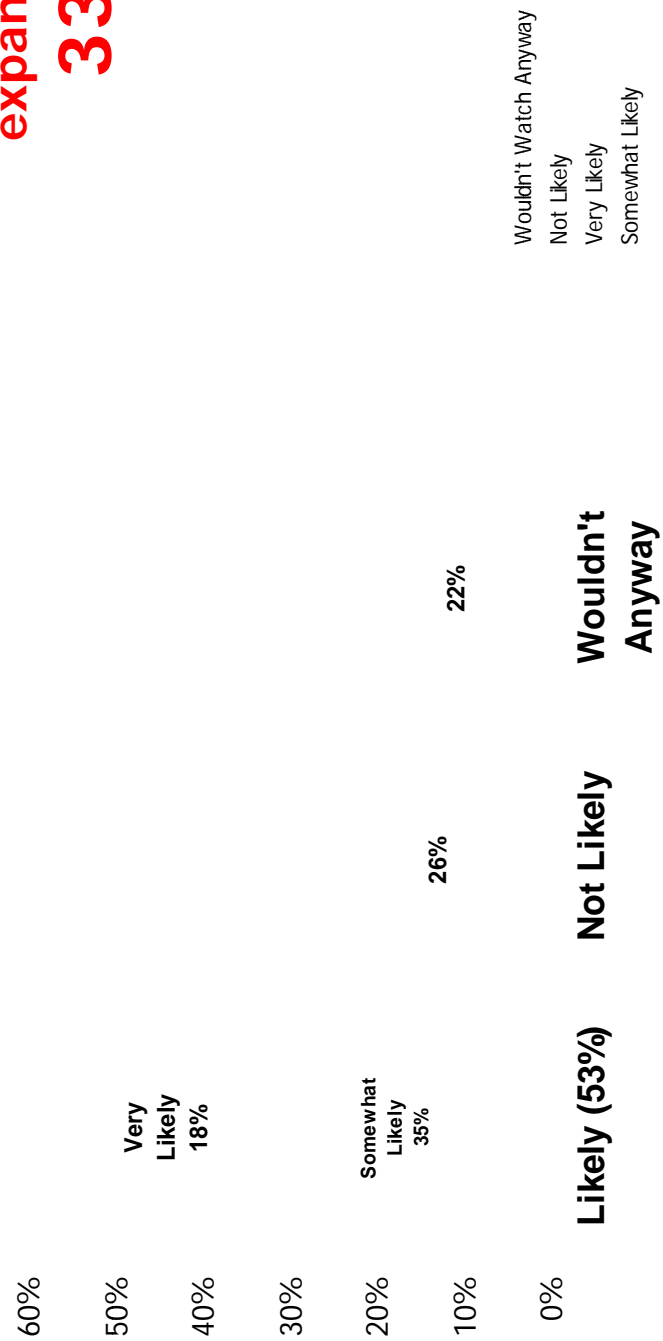
**More likely to watch
with language
filtered?
37%**

After Providing Content Information

Asked of the 62% Uncomfortable With The Language

“In general, if you had the ability to filter out offensive language, how likely would you be to purchase more pay-per-view movies or subscribe to more premium movie channels?”

An overall expansion of 33%

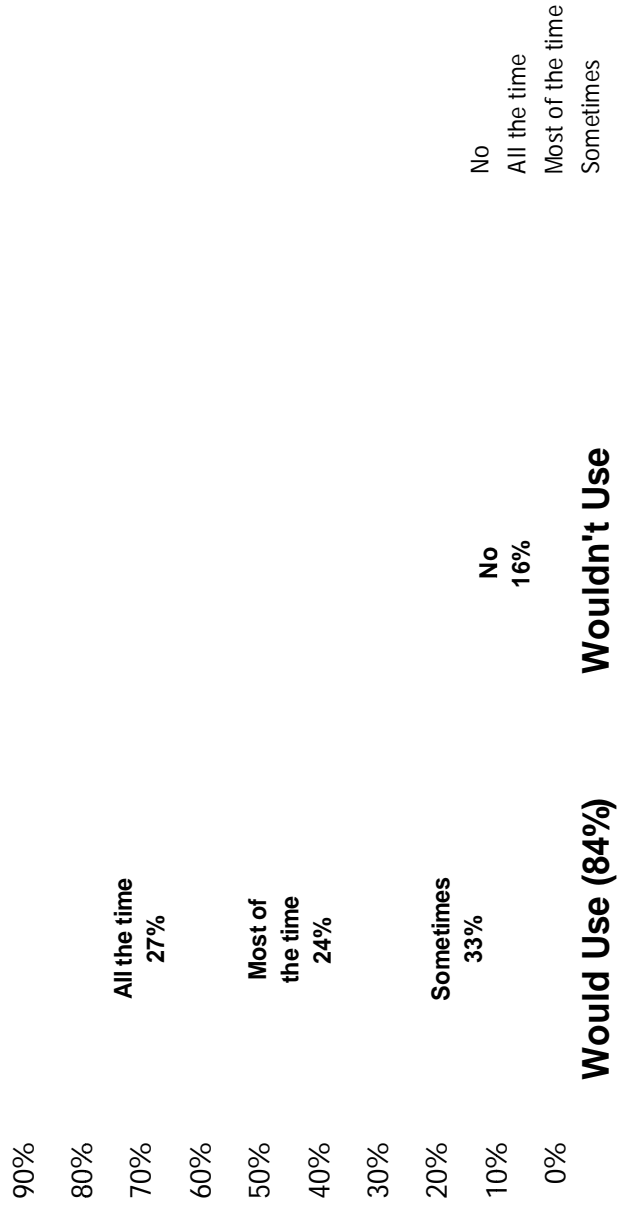


Customer Satisfaction

Asked of the 62% Uncomfortable With The Language

“If technology were included in your TV, cable or satellite box that allowed you to filter out offensive language with a 98% average accuracy rate, **would you use it?”**

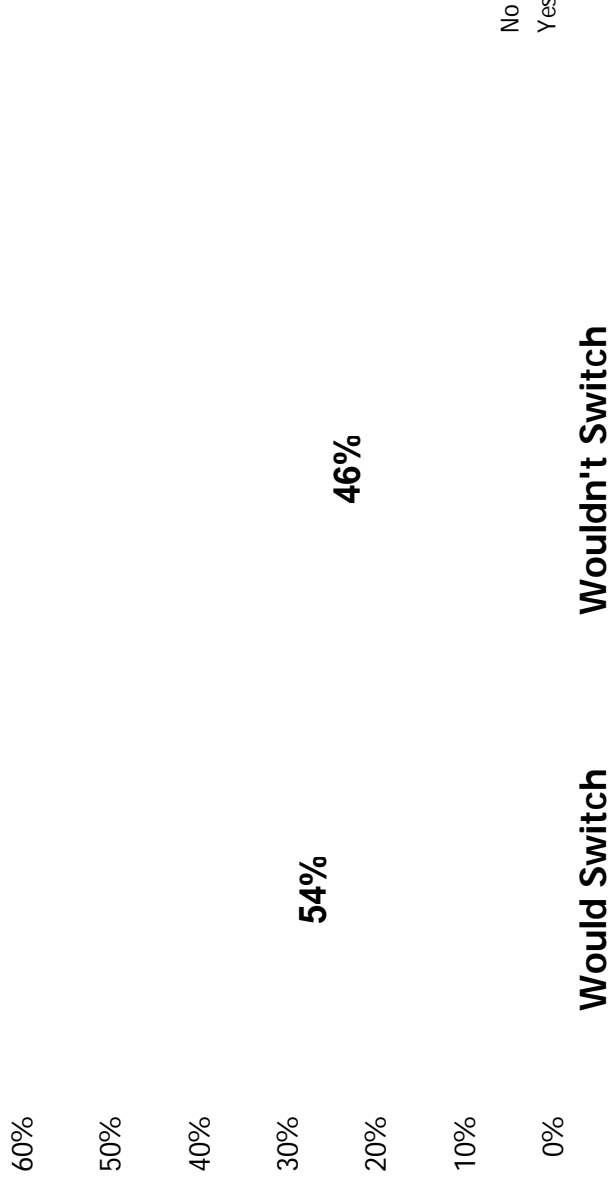
Use by the overall
market
52%



Customer Retention

Asked of the 62% Uncomfortable With The Language

“Would you consider switching your cable or satellite provider if another provider offered language filtering on their programs?”



Overall
customer base
at risk

34%

OR

Overall potential
gain from
competitors

34%



The TVG Advantage

Revenue Impact	TVG Technology	Current Parental Controls
Increase Premium Channel Revenue	+31%	NO
Increase PPV and VOD Revenue	+25%	NO
Lure Subscribers From Competitors	+34% each (would consider switching)	NO
Subscriber Retention	34% (would consider switching)	NO
Expand Overall Market Size	+4.16%	NO
Competitive Advantage	YES	NO

APPENDIX B

TVGUARDIAN BRIEF



WHAT IS TVGUARDIAN?

TVGuardian® technology automatically filters offensive language from the programs you and your family watch. TVGuardian® makes movie time, family time again, and has thus far been included in over 12,500,000 units in products including four stand-alone TVGuardian set-top box models; and DVD players, VCRs and DVD/VCR Combos from brands such as Sanyo, RCA, Magnavox, Polaroid, Memorex, and Disney.

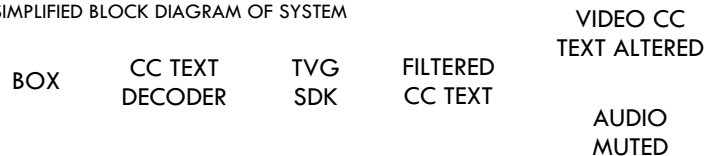
HOW IT WORKS

TVGuardian® is patented technology which decodes and monitors the hidden closed-caption text for the deaf and hard of hearing, which is required by law under the Americans with Disabilities Act and the Telecommunications Act of 1996. Each word is checked against the internal dictionary of offensive words and phrases. When a foul word or phrase is detected, based on the tolerance settings selected by the viewer, TVG® automatically mutes the offensive language. The mute is disabled upon the detection of the "erase caption" or "display next caption" closed-caption control codes; unless the next captioned phrase also has triggered an audio mute. The software also removes the offensive words from the captioned text, takes out the excess spaces, and, if needed for clarity, replaces the offensive words with non-offensive ones of similar meaning. Based on the user's preference, this modified captioned phrase is either: 1) CC On Mute Mode: displayed during the mute and erased when the mute is disabled, 2) CC Continuous Mode: displayed as part of the normal full closed-captioning, or 3) CC Off Mode: not displayed. For example, depending on the settings, a phrase like "Move Your Ass" will be muted and "Move Your Tail" will be displayed.

To summarize, TVGuardian intercepts the text data stream. It scans this buffer for offensive language. When offensive language is found, the audio is muted and the offensive language is replaced with something more appropriate.

TVG technology does work in real-time, no buffering is needed; however, it does not work with live broadcasts such as news and sporting events. Closed-captioning in live programming is typed in live, therefore, it follows the spoken word; instead of being synchronized with the audio, as is done with scripted shows and movies.

SIMPLIFIED BLOCK DIAGRAM OF SYSTEM



DICTIONARY

Support for over 400 words and phrases. The TVGuardian algorithm looks for the root word, therefore, creative new uses of foul words are detected that may not be in the dictionary, making TVGuardian technology very accurate. Why 400 words and phrases? TVGuardian examines the word usage to

determine the proper replacement word(s). Consequently, some words are in the dictionary with multiple variations of usage.

PREFERENCES

User preferences allow for the ability for each subscriber to set their own comfort level. This is handled through the User Interface that is connected to the TVG library. There are four Primary Filter Settings ranging from Strict to Tolerant. In addition, the following Sub-Categories may be turned ON/OFF in conjunction with the Primary Filter Settings: Racial Epitaphs, Drug References, Hell/Damn, Religious References and Sexual References. The Sub Categories may be expanded or decreased based on the amount of flexibility the licensee wants to offer its subscribers.

REPLACEMENTS

When words are replaced through the closed captioning display, a number of replacements are possible and randomly chosen. This is beneficial to avoid repetition. An alternate, milder, replacement word list may also be chosen by the user.

EFFECTIVENESS

TVG works nearly 100% of the time -- if foul language is captioned, we catch it. On the other hand, should errors exist in the closed-captions, such as spoken words being excluded from the text; TVG will not trigger a mute. Through fundamental changes in the library, foul words are detected sooner and more efficiently than ever before. To illustrate the accuracy, one could watch TV an entire week with TVGuardian catching 100% of the offensive language. Then, on a particular movie, it might mute forty-five words and miss two due to a poor job of captioning for the movie.

MODULAR SUPPORT

TVG supports any text based captioning system, cable, satellite, HDTV, and more.

REQUIREMENTS

CODE SIZE AND LOCATION

The current overall size of the TVGuardian® library is around 5Kbytes. The TVG algorithm adds minimal overhead to the pipeline. In addition, a dictionary table of around 2Kbytes is used to store the lists of offensive words and their substitutes. Only a few bytes of memory are used in Flash ROM to store the settings for TVG, namely the filtering options and preferences. The algorithm functions as a data stream filter. The current design utilizes a 16-character buffer, resulting in a slight delay of the CC signal. This has proven to be a good compromise between RAM usage, delay time, and cussword phrase recognition capability.

The code can be split. For example, a test integration of the TVGuardian technology was successfully completed in less than ten hours with an HD DVR satellite receiver. One small section of the code was located in the boot ROM that handled the interception of the closed-captioning, the rest of the code was located elsewhere.

PORTABILITY

The TVG Software Development Kit (SDK) is written and maintained in a highly portable C programming language, requiring minimal support to implement on any of the targeted platforms.

RECOMMENDATIONS

ON-SCREEN CLOSED CAPTIONING SUPPORT

In order to provide the best possible support, it is recommended that the Closed Captioning text be displayed through the target platform On Screen Display (OSD), or rendered using the devices own closed-captioning display capabilities.

Additionally, On-Screen Closed Captioning support in the OSD allows the consumer to use more advanced products that include features such as; HDMI, DVI, Component RGB, Progressive Scan, and Up-conversion scaling technology.

IMPLEMENTATION

REFERENCE TVG DESIGN

TVGuardian, LLC provides a reference design for embedding in one of the consumer products mentioned above. Obviously any implementation will have to be tailored to each specific situation, but some components of the design are general and easily implemented in different architectures. We have provided an embedded TVGuardian algorithm in both assembly language and C language for use in a number of different products. TVGuardian's engineering team has implemented the technology into many chipset solutions including; Microchip PIC processor, Mitsubishi, Risc, Hitachi, Fujitsu, 8051 and 80x86 designs.

Work has begun in porting the SDK to Java, in support of the OCAP (Open Cable Application Platform) standard.

SOFTWARE DEVELOPMENT KIT

Internally, we have written an SDK to assist in the implementation process. This interface helps with all aspects of implementation of the TVG technology. There are only a handful of functions for the targeted platform to support and the system is up and running. SDK documentation is available to assist in every aspect of this implementation effort.

ROAD TO IMPLEMENTATION

Traditionally a typical project takes up to 2 weeks to implement, and has taken as little as a few hours. TVGuardian, LLC will assist remotely and travel on-site to the customer's engineering facility in cooperation with their engineers. The SDK may be ported to other languages if circumstances so require.

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Appendix C

TVGuardian Technology Works across a Variety of Devices and Platforms

The FCC Notice of Inquiry specifically requests advanced blocking technology that also works across the following variety of devices and platforms:

Television. “Apart from the V-chip, we invite comment on any other advanced blocking technologies for television either currently in existence or under development.”¹

Foul Language Filtering Technology Solution: Simply add 5-10k of software to the existing television chipsets and it is ready-to-go – no additional hardware needed. Parents can set their own filter level and enjoy the entertainment while the technology automatically mutes the foul language by reading the existing hidden closed-captions in the background. The technology has settings that work for both the hearing and the deaf and hard-of-hearing.

Cable and Satellite. “In addition to technology currently available, are there any new technologies under development or on the horizon for satellite or cable? We also invite comment on how we could encourage the development of new technologies for these services, as well as their use by parents.”²

Foul Language Filtering Technology Solution: Simply add 5-10k of software to the existing chipsets and it is ready-to-go – no additional hardware needed. *This software can be downloaded over the cable/satellite/IPTV system into most existing receivers currently in homes.* Parents can set their own filter level and enjoy the entertainment while the technology automatically mutes the foul language by reading the existing hidden closed-captions in the background. The technology has settings that work for both the hearing and the deaf and hard-of-hearing.

A successful test integration has already been performed on a satellite HD DVR in which the core software was integrated in ten hours.

(Issues with the DTV transition are covered in Section VI)

¹ NOI Docket 09-26, page 10, paragraph 23.

² NOI Docket 09-26, page 12, paragraph 26.

Wireless Devices. “In addition to the blocking technologies discussed above, we also seek information on any other types of blocking or filtering technologies currently available to consumers or other technologies currently in development for use on wireless devices.”³

Foul Language Filtering Technology Solution: Simply add 5-10k of software to the existing chipsets and it is ready-to-go *as long as the programs are delivered with the hidden closed-captions*— no additional hardware needed. Once content is made accessible to the deaf and hard-of-hearing, the Foul Language Filtering Technology will work. Parents can set their own filter level and enjoy the entertainment while the technology automatically mutes the foul language by reading the existing hidden closed-captions in the background. The technology has settings that work for both the hearing and the deaf and hard-of-hearing.

Non-networked Devices. “We invite comment on whether blocking technologies exist or are under development for DVD players and VCRs and, if so, how these technologies compare to blocking technologies available for other distribution platforms and networked devices.”⁴

Foul Language Filtering Technology Solution: Simply add 5-10k of software to the existing chipsets and it is ready-to-go *as long as the programs are delivered with the hidden closed-captions* – no additional hardware needed. Parents can set their own filter level and enjoy the entertainment while the technology automatically mutes the foul language by reading the existing hidden closed-captions in the background. The technology has settings that work for both the hearing and the deaf and hard-of-hearing.

Foul Language Filtering Technology has already been deployed in approximately 12 million DVD Players, VCRs and Combos, but a problem has developed over the past two years. Prior to 2008, almost every DVD contained closed-captions in the television format standard with Universal Studios being the exception. Now, however, the industry distributes approximately 50% of the DVDs without closed-captions. Instead, they’ve gone to the SDH format (Subtitles for the Deaf and Hard-of-Hearing). The SDH format is just graphics based subtitles presented in a closed-captioning type layout. It’s not data. Instead, it’s part of the video picture and cannot be easily read by foul language filtering technology. Blu-Ray also has this issue. The Blu-Ray standard supports text based closed-captions, but the video media industry has decided not to include them in favor of the graphics based subtitle format. Foul Language Filtering Technology can potentially read these graphics based subtitles when the technology is built into these products through the use of an OCR process.

Fortunately, when these same movies are shown on television (broadcast or pay-TV) the standard closed-captioning format is required by law. Therefore, the Foul Language Filtering Technology does work when viewing these movies on TV; whether viewed on the networks, premium movie channels, pay-per-view or video-on-demand.

³ NOI Docket 09-26, page 13, paragraph 32.

⁴ NOI Docket 09-26, page 15, paragraph 36.

Content Available Over the Internet. “We also invite comment on how we can encourage the development and use of advanced blocking technologies and other parental control solutions for video and audio programming available over the Internet.”⁵

Foul Language Filtering Technology Solution: Simply add 5-10k of software and it is ready-to-go *as long as programs are delivered with the hidden closed-captions*— no additional hardware needed. When content is made accessible to the deaf and hard-of-hearing over the Internet, the Foul Language Filtering Technology will work. Parents can set their own filter level and enjoy the entertainment while the technology automatically mutes the foul language by reading the existing hidden closed-captions in the background. The technology has settings that work for both the hearing and the deaf and hard-of-hearing.

Not all television programs and movies shown over the Internet are streamed with closed-captions today, therefore, they aren’t all currently accessible for the deaf and hard-of-hearing, and, consequently, the foul language cannot be filtered either. The good news is more and more websites are including the closed-captions. Remember, the closed-captioning is already ready and available since it is required by law for television – the work has been done – the Internet sites just have not always been including it in their video streams. Concerning Internet video, the Foul Language Filtering Technology can reside in: 1) the hardware device used to play the streaming video over the Internet, such as a gaming console, or a streaming video player (see http://www.roku.com/netflixplayer/index.php?utm_source=NFLX&utm_medium=NRD&utm_campaign=HT), and/or 2) in the video player software used to watch television programs on a computer at sites, such as Hulu, ABC.com, and other TV content sites.

Since more and more people are using the Internet to view TV programs and movies, a movement to require closed-captions for traditional video content steamed online might be in order for sites that deliver traditional TV programs and movies.

Blocking Technologies Compatible with Multiple Platforms. “Finally, we seek general comment on whether there are blocking technologies currently available or in development that are capable of operating across multiple platforms.”⁶

Foul Language Filtering Technology Solution: Simply add 5-10k of software to the existing chipset and it is ready-to-go – no additional hardware needed. As long as closed-captions are available to provide equal access to the deaf and hard-of-hearing, parents can set their own filter level and enjoy the entertainment while the technology automatically mutes the foul language by reading the existing hidden closed-captions in the background.

⁵ NOI Docket 09-26, page 19, paragraph 42.

APPENDIX D

A Sampling of Quotes from 40,000 Pay TV Customers

I have had the TVGuardian box for several years and now cannot watch normal programming without it.

Shonda Riley, Kevil, KY

Having TVGuardian is arguably the best decision we have made regarding entertainment in our home.

Freeman, Lilitz, PA

Parental controls blocks entire programs and stations while a TVGuardian allows a program to be stripped of profane language. There is a big difference between products.

Nancy Kondercheck, Tampa, FL

We could watch so many more programs with the TVGuardian. We have expanded our DVD options considerably now that we have it on our DVD player and would LOVE to have it on cable TV!

Debbie Bradley, Valrico, FL, BrightHouse

The language on TV is so offensive I can't allow my children to watch most of the programming. I'm even considering cancelling my cable service because there's really nothing my children can watch without the filthy language or obscene images.

Raymond Masbad, Palm Coast, FL BrightHouse

I would love to be able to watch movies with my children. As it is now we cannot watch anything as a family because the movies have too much bad language.

TVGuardian would be great for us!

Jennifer, Melbourne, FL BrightHouse

I would definitely love for TVGuardian to be added to our cable. In fact, if our cable company offered TVGuardian I would consider adding more channels.

Craig Barnard, Columbus, MS Cable One

It would be so nice to have TVGuardian. Almost every day we are watching a show only to have to change the channel because of foul language.

Barbara, Ardmore Cable One

I can't imagine what TV will be like in five years. Will our children even be able to watch it at all??? What a pleasure it would be to watch TV without it.

Josephine Burns, Yardville, PA

We love watching TV, but let's be honest: **There is so much cussing that I've had to stop watching some of my favorite programs.** I would love to have the TVGuardian already in place without all the hookups.

Donna, Ripley, MS Cablevision

As a parent and a concerned citizen, I believe we should have the choice to view TV programming and not be subjected to cruel and foul language. I advocate the use of TVGuardian as one choice to allow viewing of TV programming. **The other choice is to stop watching!**

Brian Burns, Hamilton, NJ Cablevision

I like to watch educational programs, like *Intervention*, but I absolutely hate hearing all the bad language! Please block out all of the offensive words, or I will cancel my cable service. That's how much I can't stand it anymore!

Yvette Johnson, Edison, NJ Cablevision

Sometimes great shows are ruined by a few four letters words. We have TVGuardian in our home and it allows our family to watch TV without hearing any vulgar language.

There are still people in this world who blush, and TVGuardian makes TV viewing pleasant again.

Cathleen Carpenter, Canby, OR Canby TV

This would be a wonderful service. I only have basic cable now because of all the foul language I would encounter on the other tiers. If I could have [TVGuardian], there would be more programming available to me.

Larry Galyen, Johnson City, TN, Charter

I am so sick and tired of screening even the simplest program due to foul language.

Robert, Plover, WI Charter

I would gladly pay a reasonable amount for this service.

Michael Jennings, Barnesville, GA Charter

Dear Charter,

I was thinking last night how grateful I was that I have TVGuardian for my family. We enjoy many programs that often have language that I do not want my daughters to "have" to hear. **I know and believe that foul language is not the norm for countless hundreds of thousands of Americans and therefore I do not want it in our home.**

Lyndon Ellenburg, Anderson, SC, Charter

The public should have the choice to listen to TV programs without having to hear foul and offensive language.

Benjamin, Fortson, GA Charter

I have not signed up for cable because I cannot trust the programming but with a profanity filter my family and I would be interested in obtaining service.

David Collier, Riverside, CA

Please see that this important issue be addressed--my grandchildren watch TV at my home.

Judy Oistad, St. Cloud, MN, Charter

If TVGuardian were available from the cable and satellite companies, kids could watch SO MANY more shows that parents currently will not allow because of so much obscene language! PLEASE make this available for all Americans!

Cindy Crabtree, Weaverville, NC Charter

There are many families out there who would love such a filter, and would choose a provider based upon the filter availability, if it were promoted.

Ed Bailey, Inman, SC, Charter

YES!!! YES!!! YES!!! We would love to have TVG in our home on cable. We've thought about dropping cable because of so many offensive words, but this would make us feel better about keeping the cable without the bad language.

Andrea Loworn, Shelbyville, TN, Charter

I'm getting tired of watching television and sitting on pins and needles wondering what words are going to come out of the television next.

Alisa Myers, Woodlawn, TN, Charter

Not having TVGuardian keeps us from watching shows we otherwise would. This happened the other night on a comedy. An offensive word made us turn it off due to our four year old listening at the time.

Travis, Dayton, TN, Charter

My daughter, who is only two, should not be subjected to offensive language while watching TV with our family. **Movie and TV makers will not cut out the language, so options should be available for those who wish to avoid it.**

Anne Payne, Maryville, PA, Charter

If this were available through Charter, it would be such an incentive to keep you for my cable provider.

Cheri, Imperial, MO, Charter

I have a seven year old daughter and a son that is 17. **It is bad to hear something on your TV that you tell your children not to be saying. What can you do after it has already been heard? It's too late then.**

Audrey, Hudson, NC, Charter

Foul language does not make a program better. **Why can't we have a choice from you to make it better for our families not to have to listen to such garbage?**

Glenn Burbank, Bellevue, IL, Charter

I change channels a lot when I hear foul language ... would watch a show if I do not have to hear the words.

Cathy, Greenville, SC, Charter

As customers who have our phone, cable and internet access with Charter, we would LOVE to have the capability to block out the offensive language that pervades almost every channel. I know many other families who would also be very interested in this option.

Candace Cantrell, Spartanberg, SC, Charter

Please consider this. **My watching is limited due to the foul language on most movies.**

Virginia Williams, Athens, AL, Charter

It would be in my best interest to have this option available for peace of mind. How wonderful it would be for me to be able to give kudos to a company that looks into the best interest of families.

Ana Flores, Riverside, CA, Charter

Please provide TVGuardian. **The reason why? Try common sense.**

David, Birnamwood, SC, Charter

With television getting as bad as it is with the use of offensive language, I would love to ensure the words do not come through as my children or myself are watching the television. It is almost impossible to enjoy watching television without hearing or seeing something that offends me.

Sabrina Perlongo, Cookeville, TN, Charter

With the language and content on today's TV programs, a tool such as TVGuardian is necessary to preserve the entertainment value of television. Without such a service, we may consider canceling our cable service, as the language on television continues to deteriorate.

Emily, Cleveland, TN, Charter

We already have TVGuardian on one TV in our main family room. I am quite appalled when I go to another area of the houses to watch TV. Because I am so used to watching in the main room, I forget that the other TVs don't have this magnificent device. I think it would be awesome to have this be an automatic service.

Valerie Rhea, Mt. Carmel, TN, Charter

This is a valuable service, which would allow my family the ability to control the language coming into our home through our television. There are several shows which I will not watch because of the offensive language, although the story line seems interesting to me. TVGuardian would eliminate that problem.

Brenda Galatian, Newnan, PA, Charter

We have small children in the home and do not wish them nor ourselves to listen to the filth that is coming out of the mouths of actors/actresses today. It is not necessary for them to try to shock us with their language. Plain and simple English without smut language would be greatly appreciated.

Stanley, Kenneth, NC, Charter

There is hardly a program on TV that I can watch anymore. Everything is filled with offensive language. **I know this language is used by a lot of people but I do not want to hear it every time I turn on the TV.**

Thomas Barnett, Kingsport, TN, Charter

Dear Charter,

We have three boys aged 5, 7, and 11. Our TVGuardian DVD player filters out most of the language which conveys much of the abusive and rude attitudes which is so prevalent in kid's movies today. There are many movies we would not let our kids watch were it not for the TVGuardian software. If you added the TVGuardian we would not have to worry about monitoring language, and could watch more shows. **If a satellite company offered this in their package we could be persuaded to go with them, even though we are happy with the services we get from you (phone, internet, and cable).**

Marke Haynes, Sevierville, TN, Charter

Please offer this option to all our families. **Why should we be forced to hear obscene senseless words as we pay for entertainment in our homes?**

Janet, Nevada, MO, Charter

We would love to see our cable company offer TVGuardian. That would show us that they want to respect the moral foundation we are trying to build in our children.

Anna Dorman, Tifton, PA, City Net

The profanity that is now considered normal has become a very serious problem. I cannot even change channels fast enough to avoid hearing it. And then when you do change channels, there is another profanity being shouted. We used to go to movies all the time, now we don't. **There was a time when movies were shown on TV that they would filter out the bad language; now all they do is warn you with a TV rating.**

Joni Boykin, Angleton, TX, CMA Cable

I would love to be able to leave the TV on in a room without monitoring it. The filth that comes across the airwaves is damaging our children.

Jana, Indianapolis, IN, Comcast

I'd pay extra to have filtered cable like that.

Mike, Baker, Palo Alto, CA, Comcast

It would be so nice to be able to watch movies, and not worry about the language!!!! That is the reason I don't purchase more movies on "OnDemand" because of the language!!!

Sharon Dible, Richmond, VA, Comcast

I refuse to watch certain programs with my children present, due to the foul language that is unfiltered. If nothing else is on that is family friendly, I will turn off the television. This service would keep people like myself who are family oriented from leaving and going to another service provider that offers this.

Rico Saiz, Albuquerque, NM, Comcast

Having TVGuardian would bring me to re-subscribe to your services.

Joe Sprinkle, Loganville, GA, Comcast

We are on the verge of cancelling cable simply because we can no longer stand the language and content on many shows. **While you can't change the content, at least you may be able and willing to do something about the language.**

Gary Cowden, Centralia, WA, Comcast

I believe you'll be surprised how many new and overjoyed customers you'll have.

Lori Capps, Damascus, OR, Comcast

There are times when families take a lesser cable package because they are unable to monitor the language on many of the premium channels. This would benefit your customers and your business.

Royle Langton, Tecumseh, MI, Comcast

A profanity free TV viewing experience would be absolutely amazing. Please make every effort to make this a reality.

John McCartney, West Monroe, LA, Comcast

We do not watch television AT ALL without TVGuardian. We would appreciate having this service provided.

Trey, Southaven, MS, Comcast

Our family loves to watch TV, but it is getting harder to do that with the shows using inappropriate language most of the time. **You would bring back a huge family audience to your shows if you installed this product.**

Jessica Jagod, Woodhaven, MI

I would love to have available the ability to turn off foul language at a click of a button.

Terri, Douglasville, GA, Comcast

This would be the greatest thing to come to cable television.

Scott Sullivan, Powell, OR, Comcast

There is so much profanity and blasphemy in use today in common language that it is a "breath of fresh air" to be able to watch shows where the language is filtered. I wish TVGuardian was available directly with my cable service so that we could watch shows on all our TVs not just ones with TVGuardian equipment.

Stephen Chinnery, Wilmington, DE, Comcast

I have used TVGuardian for several years now. **If I didn't have a TVG I would discontinue watching television. I don't feel I can teach my children that profanity is undesirable behavior if I allow it into my home through the television.** If the cable company could provide it, it would be a dream come true.

Christine Partna, Portland, OR, Comcast

It is just getting to the point where you can't turn on the TV to any station and there they are "bad words" **I am tired of it! If the movie industry won't do anything about it, then the cable companies should.** There are a lot of us out there that just don't use it, please make a change!!! There are people who have kids and they don't want their kids subjected to it either.

Michelle Salas, San Jose, CA, Comcast

Please, please, offer TVGuardian on your cable service soon. I would take more of your channels, for example, HBO, which I avoid only because of the foul language.

Robert, Jacksonville, PA, Comcast

I think any company that offers this service would draw the attention of millions of others who, like me, think this is an important issue.

Heidi Tack, Clarkston, MI, Comcast

What a wonderful idea to block the foul language from shows so the whole family can watch a show!!!! That would open up a whole new world of entertainment to us. We would never subscribe to any of the premium channels strictly because of the language. We avoid the R-rated shows—that's easy. But now there are PG rated shows that have several four-letter words that are completely unnecessary and add nothing to the substance of the show. Please consider putting TVGuardian in with your cable boxes Wow—that would really be something. **Would make you look really good in the public eye—looking out for the little ears.**

Brenda, Jonesborough, PA, Comcast

Any cable or satellite provider that offered TVGuardian would be the reason I would switch providers. A company that cares for all his customers is a company I would like to hire.

Jamel Hamka, Powell, TN, Comcast

Cussing really ruins the shows and I really do not like having to listen to it. And I am completely against my children listening to it—especially my four year old who is at the stage where he repeats every new word that he hears. I would become a lifelong customer if Comcast decided to implement TVGuardian into their cable system.

Rachel Diaz, Oroville, CA, Comcast

With TV shows getting more and more adult-themed and filled with adult language, it is increasingly difficult to watch TV as a family. **A show with a good plot can be ruined for the kids by foul language. We would have more viewing choices if we could have some control over what was allowed to come into our home. As a paying consumer I think we deserve the opportunity to use this tool.** This would also open up more revenue for Comcast as people could have expanded choices of what to watch.

Lynne Konowitz, Blackstone, MA, Comcast

As a Christian mother of two teenagers, I feel that it is only right that we as paid subscribers be able to view television programs without being subjected to profanity. What used to be only allowed in R-rated movies at the theatre or on pay-per-view channels is now commonly said and done on cable television. **It seems only right that we have some say in what is said in front of our children.** With more than one carrier to choose from, I want my cable provider to allow me the opportunity to censor profanity from the programming it offers my children.

Kim Rogerson, Sherwood, OR, Comcast

TV programs today cannot be watched with the family because of the offensive language that is put into them. **With the high cost of cable today, our providers should offer this service free to keep their customers from leaving them.**

Rick Ericksen, Little Rock, AR, Comcast

I have three small children in my home, ages 5, 3 and 1. I would like to not have to worry about offensive content on TV. There is enough to worry about without adding another layer. Everyone benefits!

Jari, Silver Spring, MD, Comcast

My family doesn't watch much TV because of much of the content is not appropriate for our four year old son. We would watch more TV if we had the TVGuardian service.

David Overholt, Tamarac, FL, Comcast

I have been using TVGuardian for five years now. **I would not have cable without it.** It allows our kids to watch movies that are PG-13 (because of language reasons) as though they were PG movies.

Stan, Duluth, GA, Comcast

I cannot believe you do not have it already. Shame on you!

Sharon, Salt Lake City, UT, Comcast

I have a 12 year old and TV is getting so offensive, we are unable to watch evening sitcoms as a family. TVGuardian may be our only hope to enjoy TV.

Sheree LaCoste, Mobile, AL, Comcast

Please add TVGuardian filter because the language on TV during Prime Time is continually getting worse and worse. I cannot allow my nine year old to watch any of the Prime Time TV channels without a filter on them. The first vendor--Comcast, Dish or Direct—who does this will have the best opportunity to get my business.

Tim, Greenbrier, TN, Comcast

We aren't enjoying the programs as much as we would if TVGuardian was in force. **We miss more than half the programs we want to watch just because of the language.**

Shirley Lucas, Pacifica, CA, Comcast

Blocking channels or specific programs doesn't work. Even the characters on children's cartoons use curse words sometimes. It's very frustrating for me as a parent. It's also frustrating to my child to suddenly be told to change the channel in the middle of a program he is watching because I just heard someone use a foul word. The convenience of having TVGuardian readily available would be absolutely wonderful!

Kimberly Still, Baltimore, MD, Comcast

Enough has been placed on TV without the consent of parents. Items that used to be pay-per-view only are almost common on cable. It would be a wonderfully progressive item to have the choice to block (with TVGuardian) language which is not allowed in our house. **Please be family-friendly.**

Teri Smith, Loganville, GA, Comcast

The growing trend of vulgar, offensive, inappropriate, and foul language is forcing our household to watch and listen to less and less cable television. These unpleasant, unhealthy, and distasteful experiences can be remedied with the TVGuardian filter. We strongly request your consideration in this matter.

Sincerely,

A Paying Customer.

Mark, Haverhill, PA, Comcast

I can't enjoy a good movie for all the foul language.

Joy Ritchie, Rossville, GA, Comcast

TVGuardian is a valuable service that I use on my home DVD player and would like to see available to me on my other viewing choices. **You guys are all about choices. I will surely consider the availability of TVGuardian when I next choose between cable and satellite providers.**

Robert Grathwal, Bridgewater, FL, Comcast

I would like the freedom to watch TV without listening to offensive and foul language. This is especially true for my children. **We do not use bad language at home, and do not want our children needlessly exposed to it.**

Tim Burns, Centreville, VA, Cox

Please bring TVGuardian into my home! I would love to have it on my digital cable. My kids enjoy some movies and shows but I am very concerned for the language they hear. I would love to be able to relax knowing I don't have to send them upstairs or explain some bad word or phrase during the shows we watch. Please consider this! **If this were offered, I would have a hard time leaving your service for the quality and peace of mind it offered my family.**

Amy Speight, Buckeye, AZ, Cox

I will not watch television with TVGuardian, and we will not watch at anyone else's house without it. **This is a service our family feels is REQUIRED before we watch anything.**

Rick Campbell, Centreville, VA, Cox

I wish Hollywood would get the hint... there is no need for foul language... it does not enhance the plot.

Kevin Hicks, Tulsa, OK, Cox

We love our TVGuardian and have been using it for YEARS. It is the ONLY way we let our children watch most movies and it is ALWAYS on to screen the cable TV channels we might watch. **It is about the best thing that's happened in TV viewing in the last 20 years!**

Rob Laskin, Santa Barbara, CA, Cox

Please, please, please give me the freedom to choose what my kids hear.

Josh Carey, Oklahoma City, OK, Cox

There was a time when the airwaves were clean and I'd like that back.

Donna Harvey, Pineville, LA, Cox

It would make it more enjoyable to watch TV with the family. I think more people would add more channels to their current subscription.

Andrea, Edmond, OK, Cox

It would be a relief not to have to sit with my finger on the mute button for some shows.

Lisa Moore, Fairbanks, AK, Denali TV

For years we have ALWAYS muted our commercials or turned the channel in front of our children when the program was inappropriate and we still do, as we have older teens. Why? Because of our convictions. I suppose in the real world, where they say anything goes the foul language in most movies and programs these days may be the norm. But in most private settings NO ONE talks like these movies portray with a cuss word every other word. **I would love to see my PAID program provider offer all programs with the ABILITY to filter the foul language coming into my home.**

Randy, Grand Blanc, MI, DirecTV

My family would watch a lot more television if I had the assurance that my children would not be exposed to offensive language.

Jennifer, AL, DirecTV

TVGuardian allows me enjoy movies that I would not watch otherwise due to offensive language. Having a satellite provider that offered this service would be something that would make me EXTREMELY loyal to that provider. I would even be willing to pay extra for the service.

John B., San Jose, CA, DirecTV

Dear DirecTV,

We appreciate you quality service. **If asked to renew our subscription, however, we are inclined to say "no" because of the objectionable language which enters our home like a Trojan horse in many seemingly "good" movies and shows.**

Consequently we have considered just living without any television. We purchased a TVGuardian to help us to filter movies and to keep our home as a refuge from the environment our kids are exposed to in the public schools. If you were to provide TVGuardian as a service with our DirecTV subscription, we would become repeat, long-term customers.

Sincerely,

The Sumner family

John Sumner, Stafford, VA, DirecTV

My family & I have had many discussions about television and whether or not to keep our service for this very reason. If TVGuardian were an option, we would not have to consider this after all. We know many of our friends have parted with service and don't have cable or satellite. We are definitely leaning toward ending service due to this issue (as we did with cable before we got DirecTV). Give families a choice! Be a leader in this industry and help families clean up the airwaves.

Monique Ward, Hillsboro, OR, DirecTV

My husband and I were just discussing this last night. Either the channels need to come with a filter like the TVGuardian, or we are going to have it cut off. We are so tired of buying channels that are filled with smut. We have them all blocked out, and we are tired of paying for them.

Lori, Colcord, OK, DirecTV

I am the father of four children who enjoys all the options and choices of entertainment I get from satellite. As a parent, **I don't enjoy blocking the entertainment I am paying for because of inappropriate language.** It may only be one or two offensive words, but I will block the entire program because of it. It would be great to fully get my money's worth and see the program without the two inappropriate words.

Breck, Germantown, TN, DirecTV

As a family, we are disgusted with how low Hollywood and the entertainment industry has stooped. It feels like the morality limbo—"How low can we go?" Even with what is supposed to be "family" entertainment, we may find ourselves shocked with bad language in a movie that is geared for children! **Lately there is advertising about parental controls, but what can those parental controls do for "family programming" that one would think was a good choice? Nothing. TVGuardian gives parents REAL control and options and can make TV viewing truly family-friendly, instead of running us out of the room.** It is probably one of the few options left...besides throwing the TV in the yard!

Constance Smith, Wade, NC, DirecTV

There are a lot of shows that would be fine to watch if it weren't for the language. **No child should be subjected to what is allowed on TV today.**

Debbie, Aragon, GA, DirecTV

Dear DirecTV,

I would really like the TVGuardian to be included in your equipment where I could remove the foul language that my family and especially my children do not need to hear. My family already does not watch any R-rated programs and soon will not be able to watch PG-13, as they are getting just as bad as R Rated shows.

Please add this to your receivers.

Concerned Customer,

Cindy McElwee, Flower Mound, TX, DirecTV

I have told my friends about DirecTV, but I KNOW that they would be much more likely to subscribe with an added benefit like TVGuardian. It would be refreshing to see a company support families in this way!!

April Hicks, Maylene, AL, DirecTV

Having a family, it is important to be able to control what is viewed AND what is heard. More and more we find that programs that would otherwise be fine to view, get spoiled by spotty offensive language. We have many friends that have already canceled their service for this very reason. Nothing to view, and what there is, often has unnecessary language. Fortunately, we have TVG at home and have recommended it to others. I am sure that adding this option can't hurt and will only serve to help your service offering. You won't lose business because of it and you might even maintain or increase business with it.

Fred Moulden, Sunnyvale, CA, DirecTV

TVGuardian allows you to watch in the company of other family members. Ninety percent of those I've spoken to about the foul language on TV have expressed discomfort with the cursing.

William, Prescott, AZ, DirecTV

It would be a remarkable gesture to our young people. There are so many families who would use this service if available. I believe it would also help the provider because more families who are conscious about foul language for themselves and their children would watch more pay per view movies as well as regular channels if they knew they could filter the content. **Please provide this service—at least for our children.**

Tony Wallace, Semmes, AL, DirecTV

This one product alone would convince me to stay with you as a customer. If your competitors offered it, I would be forced to switch my service.

M. Scott Knuckles, Garden City, NY, DirecTV

Please allow us to have TVGuardian—the words that slip out in a primetime sitcom are horrid.

Tyler Gray, Simpson, IL, DirecTV

Imagine how many paid channels—movie viewing, such as HBO, or Showtime—that I would allow in my home if there was an automatic filter on the language. For now we're limited only to certain channels.

Rebeca Klick, Temple, GA, DirecTV

We REFUSE to pay for premium channels because we will not watch movies without a foul language filter. Until a foul language filter is provided we are very happy with basic satellite service.

Edward Shelton, Inglewood, CA, DirecTV

We have three TVGuardian's on three different TV's in our home because we were fed up with all of the foul language. Why can't you have the TVG unit built into the receivers so the homeowner can decide what is allowed into their home? Please consider our right to not hear the garbage streaming into our homes.

Allan Grogan, Harrison, AR, DirecTV

As a result of all the filthy language in ninety percent of the movies, we miss seeing a lot of good movies for that reason. I had Starz at one time and cancelled because the only channel that had no foul language was the Western Channel. It would be wonderful if DirecTV gave us the opportunity to watch these movies minus the foul language.

Nelson, Bel Aire, MD, DirecTV

We have a two-year-old daughter, just learning to talk, and it's amazing the things she'll repeat! **Profanity serves absolutely no purpose, except, perhaps, to purposefully offend, and we do not want it in our home.** We would greatly appreciate the service that TVGuardian provides families like us who wish for a wholesome environment in which to raise kids.

Lisa Glynn, Springfield, MO, DirecTV

Our family's usage of television programming is specifically and intentionally limited because of the lack of ability to screen what we are exposed to. Even as a 37 year old adult, I do not care to listen to filthy language. When the entertainment industry gives me the ability to support them without subjecting myself and my family to unnecessary language, I'll start spending more money on movies and television.

Boyd Anderson, Heber Springs, AR, DirecTV

I have used TVGuardian for three years and without it would no longer be able to watch most shows on TV.

Dale Holman, Lakeland, FL, DirecTV

As a satellite subscriber, I'm interested in having options. With TVGuardian, my options would be increased tremendously as it would allow me to watch practically any show with my family without having to be concerned about foul and/or offensive language! Adding TVGuardian to the list of options would give everyone real freedom of choice in what and how they watch.

Carolyn, Ovilla, TX, DirecTV

I am highly offended by the increase in vulgar language on television. It seems writers have no decent vocabulary, so they must show their ignorance by using profanity. **I will not allow my ears to be the world's garbage dump!** Please make TVGuardian available as part of my satellite service. Thank you for standing up for what's right!

Susan Campbell, Richmond, VA, DirecTV

Yes I would like to have TVGuardian offered from my satellite provider. I have it in my living room, but there are times when my children watch in another room or at someone's house. **Just because some people like to say or hear profanity shouldn't mean my kids should have to miss out on shows that would be decent if not for the language.**

Vivian Grissom, Toledo, IL, DirecTV

We have a one-year-old in the home now, and I'm really uncomfortable with the idea that she could pick up language that we adults in the home don't use. Also, there are quite a few movies or programs out there that might be worth watching if there weren't unnecessarily overused expletives. It wouldn't take away from the program to have normal everyday language. What do you have to lose?

Patrick, Miami, FL, DirecTV

We have children and frequently find objectionable content even on what are labeled as children's channels. **In a world that thinks profanity is OK, we are trying to teach our children that it is not right.** Having TVG accessible would be a great addition to the TV programs we love but do not like to hear because of all the foul language.

Tony, Riverside, CA, DirecTV

We enjoy DirecTV but unfortunately we spend a lot of time surfing the channels trying to find something without foul and offensive language. We urge you to make TVGuardian available via our satellite. **I would subscribe in a heartbeat!**

Winona Hail, Elk Grove, CA, DirecTV

With morals in our great country eroding so rapidly, why not give the public the opportunity to take advantage of this offer? I have TVGuardian in my home. Now when I sit and watch TV with my grandchildren, I am not embarrassed.

Bill Wallace, Hayden, AL, DirecTV

Children are impressionable, it's a fact. **I would think much more highly of a company that was willing to take at least some responsibility for well being of our country's children. I would also be more likely to recommend that company to others.**

Joyce, Bessemer, AL, DirecTV

This is way overdue. I will gladly support any service that will keep my family from the rampant profanity on the airwaves today!

Maria, Riverside, CA, DirecTV

I am a school teacher and see the effects of TV on our children. With the inclusion of TVGuardian with your services, many families will truly benefit, as well as the rest of our world.

Myrna G., Santa Clarita, CA, DirecTV

Until TVGuardian came along, our only choice was to change the channel. With TVGuardian, my family and I can now view content without the offensive language.

Scott Turner, Van Buren, OH, DirecTV

It would be nice to at least have the option. As it stands right now I do not have cable or DirecTV because I get tired of the language that is used.

Chad, Belgrade, MT

Christians would pay extra for this service, I'm sure. I know I would!

Charlotte, Cheraw, NC, DirecTV

PLEASE!

Ted Brassard, Summit, NY, DirecTV

Harsh language is the reason I don't get the premium movie channels. I would love to get them because I love movies, but it's hard to find a movie that I can watch with my family that we can enjoy without being bothered by lots of unnecessary bad language.

David, Alexis, NC, DirecTV

Without TVGuardian, my family will be limited to old movies, sports, and historical viewing.

Ken, Johns, AL, DirecTV

Dear DirecTV,

We enjoy your service, but not the swearing. We have little ears around and want to have a family friendly atmosphere at TV time.

Rudy Di Giovanni and Family, Chino, CA, DirecTV

The language on TV and in the movies for adults and children has gone way too far. We avoid all movies with R ratings, yet many have something of value.

Bruce and Barbara Graham, Ranchberg, NJ, DirecTV

If we didn't have a TVGuardian we would not use DirecTV. It allows us to watch shows/movies without having to be 100% sure the language is clean. **By the way, we bought TVG several years ago because of our kids, but my wife and I couldn't watch TV without it now...** If you add TVG to my service, I would be happy to pay for it!

Bruce Whipple, Cleveland, OK, DirecTV

I think TVGuardian could be the best thing to happen to satellite programming.

Jose, Visalia, CA, DirecTV

I have used the box for the past five years and will not watch TV without it.

Ari-Beth, Griffin, GA, DirecTV

I have a three year old daughter... She absorbs the world around her at an amazing level... She's like a sponge for language, numbers, colors, ideas, motor skills...all of it... She's really learning. Much of the language we hear—even in prime time—is not good for our daughter to absorb... The ability to filter language out would be FANTASTIC

Joel, Spring Hill, TN, DirecTV

I cannot express how strong I feel on having to listen to foul language on my HD TV using your Dish Network. Please provide a filter where we, your subscribers, can watch TV without being offended.

Robert Moorman, Saginaw, TX, Dish

Freedom of speech should also include the freedom to not hear speech that is inappropriate or offensive.

Cathy Smith, Shreveport, LA, Dish

I have 2 small children in my house and screening out the foul language would be an option I really need.

Susan, Oregon City, OR, Dish

Should a cable service add this to their programming first, I will be forced to choose what is better for my family and what aligns closer to our values.

Randy Hyde, Arlington, TX, Dish

I would forever be a Dish Network customer if I could get TVGuardian built into my receiver.

Roderick, Many, LA, Dish

We have two a three-year-old and a five-year-old and they do not need to hear foul language when they watch TV.

Vickie, Oklahoma City, OK

We have significantly cut down on the amount of TV we watch in our home because the language is getting to be way to over the top.

Paul Durbin, Devils Lake, ND, Dish

It isn't enough to offer parents channel blocking capabilities. Parents and children alike would appreciate the opportunity to filter inappropriate and completely unnecessary language found in more and more shows and movies. There are many shows that without the added bad language would be appropriate for me and my children to view together. If you think about it, it really is a win-win situation. More viewers of the shows mean higher ratings and more products sold in advertising. And because it would be up to the consumer whether or not to use/activate the filter, no complaints, only happier customers which equals loyal customers.

Matthew Mitchell, Matthews, NC, Dish

With young children in the home, it has gotten almost impossible to watch any TV program because of the useless foul language used on most programs. I'm no prude by any means, but there are times that I have to change channels because the language is so foul.

Not only does this use of foul language say volumes about the IQ of the people producing these shows, but it speaks even more volumes about the people sending these programs out through their networks, whether it be cable or satellite.

The only reason we have satellite is for sports. We can hardly watch movies or even network TV because of the language.

Thank God for TVGuardian.

Gary, Springfield, MO, Dish

We, as well as many of our friends are turning away from TV viewing, because the language is so offensive. **If we didn't have TVGuardian, our viewing would be reduced further by 75%.** We limit our viewing to Close Captioned programs, so that we can have the TVGuardian filter protection.

Dale, Portage, WI, Dish

I am so sick of trying to watch a show with my four kids and have to turn the channel or turn the show off. **I beg of you please to take on the TVGuardian service to keep my business.**

Michael Gardner, Casper, WY, Dish

The cable and dish providers so readily offer X-rated programming. Please offer something for those of us who don't prefer those things. I would switch providers to get this service. Especially if it meant one less thing to hook up to my TV.

Mary Jane Callaway, Rincon, GA, Dish

You should not have to listen to the offensive language from Hollywood to watch a good movie. When you have children and it has so offensive of language you just have to change the channel to protect them from it.

Steven Shelton-Puller, Richlands, VA, Dish

Please consider this, as **I represent millions of moms who only want the best for their children!!**

Ann West, Lamesa, TX, Dish

This is a must for our children.

Judy, Claremore, OK, Dish

I frankly will not watch TV without my TVGuardian hooked up. The language that is prevalent in TV shows today is ridiculous. If the cable and satellite companies don't want to lose viewers, I'd think they would welcome offering this service.

Tony Hernandez, White House, TN, Dish

Not everyone wants to hear foul language. We shouldn't be forced to hear it. **We should at least have the option. After all, I'm paying for it.**

Steven, Oakes, ND, Dish

I would love to see a language filter offered by my cable provider. I could watch TV with my kids a lot more.

Bryan Lacy, Spring, TX, Dish

We would love for Dish Network to go the "extra mile" to support family entertainment by using TVGuardian. What a great way to give your customers another option in their television viewing.

Greg Steinke, Cool Ridge, WV, Dish

I would pay extra to have this service. **Then maybe I could get something else besides the family package.**

Deborah Kuch, Tualatin, OR, Dish

I have four children, aged 10 and under. We can't even watch family shows without hearing some type of foul language. **Why should we be forced to hear it?**

Halee, Oakes, ND, Dish

This would be the best thing you can do to help improve your customer satisfaction and increase the number of your customers.

Larry Kennedy, Lucedale, MS, Dish

Earlier this year I looked up the names of the leaders of Dish Network and made the request that THEY look into providing a profanity filtering system for their customers.

Bob Emrick, Heath, TX, Dish

I have wished many times to be able to know in advance if there was dialog in a movie that I felt was not appropriate for my children. I hear enough foul language at work and outside of my home and do not need to be subjected to it onTV.

Keith Hitchner, Philadelphia, PA, Dish

TVGuardian is the greatest thing to happen to our TV. With five children, we have been able to watch PG movies without the language.

Beverly, Clarksville, VA, Dish

We live in the 21st Century, where just about anything should be possible. My family has definitely enjoyed the benefits of TVGuardian for many years and have recommended to our family and friends. Why not beat everybody else to the front of the line? Go for it.

Tom, Greenville, MS, Dish

As a parent of four young children, I was hesitant about getting satellite TV. That decision for me and many other parents would be a lot easier with TVGuardian installed.

Teressa Perez, Monterey, CA, Dish

I'm seriously considering getting rid TV altogether, due to the continuing and difficult-to-monitor situation with bad language.

Tammy, Aledo, TX, Dish

The other day, I walked out of the room for one second and when I came back in the "family" movie my kids were watching a few "choice" words in it!

Donna LeBlanc, Kaplan, LA, Dish

You would have even more business if you offered this service. There are many of us that hate hearing offensive language in our home. I would order more programs if I could delete the foul language.

Kathleen Greer, Elkton, FL, Dish

It seems no matter what you watch or what time, the language is getting really bad. I think the programming would be just as good with decent language. **I would like to be able to watch TV without having to worry about my kids walking into the room.**

Charlotte Helton, Eubank, KY, Dish

I have a nine year-old son. I would prefer that he not hear profanity in my house. There are many very entertaining programs on TV that would be great to watch if not for the profanity. **I can't control what we hear outside our home, but I do want to be able to protect my family when we are home.**

Rafael Cruz Jr., Youngstown, OH, Dish

This is the best product I've ever seen. It allows us to watch programs we could not normally watch because of the bad language. I think this should be available in every venue offering programming to families!

Elesia Helton, Bremen, GA, Dish

You offer us parents rating locks so we can block bad shows...

You offer us channel locks so we can block bad channels...

You even offer us adult channel locks so that the XXX channels do not even appear...

You offer us a lot of choices to stop what we see.

How come you do not offer anything to stop what we hear?

Are the Ears any less important than the eyes?

I Bought a Sanyo DVD with TVGUARDIAN just so I would not have to hear cussing, when I play DVDs, that is why I NEVER EVER buy a PPV movie from Dish Network.

TVGUARDIAN works.

John Custer, Fairfield, CA, Dish

For my kids.

Eddie, Bristow, OK, Dish

My family and I enjoy watching TV, but we do not enjoy the profanities on the air. On an almost continual basis anymore, we have to turn the TV off due to the language problem. We would love to have TVGuardian available through our satellite (and cable companies) at home on a full time basis. So many families have this problem and would rather not watch anything at all than to watch profane TV. TVGuardian would help resolve this issue for so many.

Leslie Taylor, Clyde, TX, Dish

Because the language on TV—especially premium channels—has become so offensive, my remote control gets a workout. A program gets three strikes and it's off.

We don't use foul language, and we won't watch programs that include it. If

TVGuardian can eliminate it, I'm all for its inclusion in my Dish package.

Karen Ehmen, Lincoln, NE, Dish

If a satellite or cable were to offer TVGuardian as a service, I would be apt to switch or stick with that company for that one reason. We have TVGuardian on a few of our DVD players and love it. With four kids, we want a language safe environment if we can provide it.

Douglas Holtzmann, St. Louis, MO, Dish

My contract with Dish Network will be over soon and I've been contemplating if I want to stay with your service. **If you were to offer TVG then I would DEFINITELY stay with your company.** Thank you for considering this matter. You're very wise to do so and I would spread the word far and wide if you go with TVG.

Nancy D., Albany, GA, Dish

If it were possible to get TVGuardian on Dish you would have me as a customer forever. I would even pay a premium for the service. I have had this product in my home and we love it.

Jeffrey Swanson, Sandy, UT, Dish

I have had a TVGuardian connected to my TV for almost 5 years now. I would never, ever watch TV without it.

Marilyn Williamson, Needham, AL, Dish

I know many people who don't have cable TV due to the foul language.

Alle, Camilla, GA, Dish

I get tired of watching a movie which is PG or NR and then get surprised with offensive language. My children want to watch TV without being offended with cursing. Even some TV shows have cursing in them. It would be nice to be able to watch TV without any cursing.

Cynthia, Buffalo, TX, Dish

It's sad to say, but it's hard to watch a PG13 movie or any television show now without having to worry about what bad language is going to be on there. We have a hard time getting a movie that our whole family can watch and enjoy without worrying about what bad influence our children might pick up off of it.

Jennifer, Lenoir, NC, Dish

Please provide TVGuardian to us. **My kids are at the age where they repeat what they hear and I do not want them saying things they hear on TV.**

Robbie Barnes, Winchester, KY, Dish

I have a family of all ages—teens, adults, and preschoolers. We like group TV and the language has to go. Even when I watch TV alone I don't care for the language. **The bad language ruins the movie.**

Fanny Michelle Hinton, Silverhill, AL, Dish

I am so concerned about what my children watch and have many times thought I would simply have the cable cut off. This service would really help alleviate some of my concerns. Even those "safe" shows aren't really that safe.

Lisa Combs, Dora, AL, Dish

It is very difficult to sit down and have a FAMILY night when even some of the movies on the FAMILY channel have vulgarity.

Julie, Jonesboro, TX, Dish

I love watching movies, but HATE the foul language. I will not watch movies with foul language and I certainly do not want my children to watch them. I would love to be able to have the bad words blocked out on my TV through my satellite system.

Deborah, Muse, OK, Dish

We would love to have TVGuardian offered via our satellite provider. **This would allow our family to view more movies offered either through pay-per-view or any other movie channels.**

Christie Wilson, Cat Spring, TX, Dish

I would like to see TVGuardian added to DISH Network so that our family can watch TV as a family and not have to worry about the language that will come across. There are so many shows that we can't watch as a family because it has things that I do not want my twelve year-old to be exposed to. Please make this happen for us.

Paula Smithart, Gatesville, TX, Dish

I have a three year old and don't want to expose her to filthy language.

Sarah Freisen, Paris, TX, Dish

We currently have a TVGuardian and would not think of not having this protection.

Larry Bragg, Carthage, MO, Dish

What a fantastic idea! **We have considered giving up television altogether, but with TVGuardian available, we have not.** It would be absolutely wonderful if Dish Network offered it built in.

Mark, Murrieta, CA, Dish

Our family is distressed with the casual attitude the networks now have about cursing on daytime and family-hour television. Please give us the option through TVGuardian to censor the foul language for us and our young children.

Greta Gunn, Des Moines, IA, Dish

Being able to set the level of "dirty language" that is allowed into our home would be a wonderful advantage to your service. Those not interested in filtering language could not use the TVGuardian technology, but the customers who are (and there are plenty of us!), would be so grateful. This would be a wonderful perk for your company.

Gene, Westlake, LA, Dish

I am offended by the foul language used on TV. **It would be more relaxing to watch a program without all that profanity.**

Ronnie, Doran, VA, Dish

We have six young children and do not want them to be exposed to this language at home. **We realize we cannot protect them when they are away, but we would like to have the power to control what they are exposed to within our walls.** I have used TVGuardian in the past and it makes a world of difference. I LOVE IT. I think this is a huge step in the right direction. **I would be your first loyal customer if you offered it.**

Tiffany Janish, Oklahoma City, OK, Dish

It would be nice to at least have the option. As it stands right now I do not have cable or DISH because I get tired of the language that is used.

Chad, Belgrade, MT

Please give people the choice to view TV through your service without the need of hearing foul language. This will be a great option for your customers to have. This will lead many people to choose your company over others.

Ben Crosby, Columbia, SC, Dish

This would be one of the greatest offering from any cable provider. **I would change to whoever is first on the market if my current provider is not the first.**

Stephen, Cragford, AL, Dish

The use of foul language has become so prominent that I refuse to watch a number of programs.

Darrel, Elon, NC, Dish

One of the reasons I don't subscribe to the premium channels is foul language. I just don't like foul language in my home.

Robert Jackson, Edison, NJ, Dish

As a Dish customer, we would be able enjoy your programming and be more than satisfied if we did not have to endure constant bad language. We often turn off the TV rather than surf endlessly for an enjoyable program. We would definitely continue with the Dish Network if you had a TVGuardian feature to rid our homes of foul and offensive language. Please consider this service and be a leader of protecting the children and families. We would be so very grateful!

Carol, Lexington, SC, Dish

There are many movies on HBO, etc., that are appropriate for my family to watch except for the foul language that is in pretty much everything nowadays. This would be a great addition to DISH network and make our movie time more of a family experience.

Craig, Fontana, CA, Dish

I am offended by foul and offensive language. **I recently went to a smaller package because I was tired of the filth in my home.** I own a TVGuardian but am unable to use it due to our surround sound. It is a wonderful service for families.

Michelle Willis, Bakersfield, CA, Dish

TVGuardian from my cable or satellite provider would be fantastic. It would be important enough for me to switch to the company that provided it. As technology advances from year to year it has become more difficult to continue to integrate a stand-alone TVGuardian box into my entertainment system. A foul language filter from my programming provider would eliminate this problem.

Shannon, Springfield, TN, Dish

Please consider offering TVGuardian to your DISH subscribers. **Foul language permeates nearly every channel you offer these days.** It really limits what we as a family can enjoy together. This is a wonderful idea and should be available to all families. **I believe it would place your company above the rest were you to begin offering such a service.**

Lisa Cherry, Washington, TX, Dish

If we knew when profanity would occur, we could change the channel, but we can't. I don't like hearing it; and I don't like our children, grandchildren or any of their friends or our friends being forced to hear the offensive language in our home that comes from the current programming. We are familiar with TVGuardian and love what it does.

Neal & Marcia Bosshardt, Redmond, UT, Dish

We don't have to listen to foul language in the workplace, why at home?

Bob, Walden, NY, Dish

If we could filter out cussing we would watch more TV.

Brian Bost, Cogan Station, PA, Dish

Some of your programs are good, but are ruined by the foul language.

Daniel, Louisville, KY, Dish

You would get tremendous goodwill from parents like us who are concerned about the bad language that is so prevalent, even on so-called teen or youth-oriented shows.

Kirt Rawlings, Shingle Springs, CA, Dish

We are avid users of TVGuardian. When my son goes to another child's home we worry about the cussing on their TV. Many times our son leaves and goes home.

Alan Strong, Rocky Ford, CO, Dish

I would love to see TVGuardian provided through Dish and if others did I would quickly switch to them.

Phil, Huntsville, TX, Dish

My husband and I have very seriously considered removing Dish from our home.

We are extremely disgusted with the language and content in the shows nowadays. I would be more willing to keep Dish in our home if this feature was available.

Otherwise....

Janeta, Yukon, OK, Dish

If the choice was to have no TVGuardian or no TV period, we would choose no TV period.

Rusell McAllister, Richmond, KY, Dish

The only way for us to enjoy movies without having to hear foul language is through the use of TVGuardian filter. **I will not renew my contract with Dish Network if they don't provide this service.**

Amelia, Altamonte Springs, FL, Dish

My family refuses to watch the majority of programming because of foul language and immorality. We would be delighted to be able to enjoy more programming if TVGuardian were made available through your satellite service. Please consider adding this feature to your programming capabilities.

Beth Doody, Rich Hill, MT, Dish

Adult channels are offered for my convenience. I believe that an option on the other side of the moral spectrum would be a great way to show that the cable and dish companies truly care about all of their customers.

Charles, Neenah, WI, Dish

We have never used foul language in our household. Why shouldn't we be able to watch a TV show or movie without flooding our home with one offensive phrase after another! Last night, we discovered that Showtime was having a free preview, so we tuned in one of the movies. Within five minutes we had heard every foul word known to mankind. We flipped through every Showtime station and even though a couple of the movies looked like they would have been really good, **we just didn't think it was worth inviting a foul-mouthed stranger to sit and talk to us from the corner of our living room. Come on DISH, you can do better! TVGuardian could fix all that.**

Debbie Grove, Smithsville, KY, Dish

My family and I enjoy watching television. However, since the proliferation of vulgarity and profanity, we have discontinued satellite television. It is important to me to not have foul language enter my home. TVGuardian has protected my family for many years from profanity over the television. **My willingness to subscribe to your service would be greatly affected by your willingness to offer this service.**

Eric, Kirtland, NM, Dish

The language on TV is getting worse and honestly, the only way I can watch it any more, is with TVGuardian. We've held off on buying an HD television because of this... but if DISH starts offering TVGuardian as a service, we'd go ahead and get a new TV and pay for DISH's TVGuardian service.

Josh Dougle, Choctaw, OK, Dish

I am considering cancelling my dish service due to the foul language on almost every show.

Michelle Bowen, Wichita Falls, TX, Dish

I wish that I could just turn on the TV without having to worry about hearing what I don't want to.

Trisha, Fort Smity, AR, Dish

I don't want to block the program but would like to have control over the language they use in those programs.

Marion Eckstein-Landry, Bakersfield, CA, Dish

If I had to choose between two cable companies, I'd certainly choose the one with TVG, hands down.

Vicki Copeland, Harvest, AL

My children are not even allowed to use words like "stupid" or "shut up" but every day they are bombarded with foul language such as "crap" and "bitch" from our television. Please seriously consider offering this product so that the thousands of families disturbed by this trend will not resort to no longer watching television and so that our children can be protected from this negative language and kept innocent for as long as possible

M.M. Falcon, Victoria, MN, Mediacom

Watching television without foul language would be wonderful. I will definitely switch to a provider that offered this service.

Connie, Meridianville, AL, Mediacom

TVGuardian is a must-have in our home. We choose not to subscribe to cable or satellite, but if TVGuardian were offered with either service, we would be much more likely to subscribe, knowing we could have extra control over the content coming into our home.

Trina, Medford, OR, No Provider

If this was something that was provided by cable or satellite networks, we might consider signing up again. I hope that you will take the time to look into this product and consider providing it as a service to your customers that would like some family viewing choices.

Wendy Wheat, Fort St. John, BC

It should be available to anybody who wants to clean up their entertainment world.

Jake, East Bend, NC, Time Warner

Finally someone is thinking!!! I would LOVE to have this offered to our family. If the cable companies would listen to their customers and cut this GARBAGE out we would be able to watch a family show and eat popcorn together and not have to worry about the profanity coming in our homes.

Wendell Fields, Clyde, OH, Time Warner

My kids would be allowed to watch more cable if this service was available. **WHY, WHY, WHY, WHY, WHY, WHY are you not doing this already? Kids do not need to be exposed to such bad language.**

Danny Phillips, Lumberton, NC, Time Warner

We use TVGuardian extensively. We have it on the TV in the living room and only rent movies on that TV so that they can go through TVG. **WE WILL NOT RENT MOVIES FROM TIME WARNER—ONLY DVD'S FROM THE LOCAL STORE. You are missing rental fees because you do not offer TVGuardian as a service.** Please include this wonderful option to your customers.

Tam Schreiner, Wind Lake, WI, Time Warner

Dear Time Warner Cable,

I would really like to see your services have TVG in them. I canceled your services because you don't have it. I will not come back to you until this happens! I know many others who would come to you if you had TVG already built in your services.

Jamie, Neenah, WI, Time Warner

TV is FULL of foul language which potentially lowers a TV show or movie appeal to the public audience. I have walked out of movies due to the excessive amount of cussing. Please enable the language filter on cable. I know there would be a GREAT increase to sales if this service was offered!

Brian Hecker, Tampa, FL, Time Warner

This might sound strange, but I am seriously considering canceling my cable subscription because I can't get TVG to work with it. While we like the additional options that cable offers, there are simply too many programs that use objectionable language. We find ourselves watching less and less TV. **Offering TVG would seem to me to fit right in with the philosophy of offering a large variety of options to appeal to the most market share.**

Doug Baker, Loveland, OH, Time Warner

I absolutely, positively would buy this service for every single TV in my house!!!!!!!!!!!!!! This would make watching TV much safer for our family. I Wish I had this service right now!

Stacy, Raleigh, NC, Time Warner

If we are willing to pay for a service, why would you NOT be willing to provide it?

We have children that would enjoy many more programs were it not for the language and we ourselves refuse to watch many programs for the same reason. Please allow us to enjoy what others enjoy without the offense.

Kevin Robinson, Kenosha, WI, Time Warner

I would definitely purchase more pay per view movies if I could be assured that my children and family would not be hearing foul language. As soon as an alternative presents itself, I'll take that alternative even if it means switching to satellite.

Joe Helm, Menominee Falls, WI, Time Warner